UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

SEP 19 2014

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

REPLY TO THE ATTENTION OF:

Mr. Rich Stern
Vice President of Operations
Lamp Recyclers, Inc.
3055 Holmgren Way
Green Bay, Wisconsin 54304

Re: Notice of Violation
RCRA Compliance Evaluation Inspection
Lamp Recyclers, Inc.
EPA I.D. No.: WIR000125831

Dear Mr. Stern:

On February 26, 2014, a representative of the U.S. Environmental Protection Agency inspected Lamp Recyclers, Inc. (Lamp Recyclers) located in Green Bay, Wisconsin. The purpose of the inspection was to evaluate Lamp Recyclers' compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. Please find enclosed a copy of the inspection report for your reference.

Based on the information provided by Lamp Recyclers personnel, a review of records, and personal observations made by the inspector at the time of the investigation, EPA has determined Lamp Recyclers is engaged in the management of hazardous waste without a hazardous waste storage license, and is in violation of the requirements of the Wisconsin Administrative Code and the United States Code of Federal Regulations (CFR). To be eligible for the exemption from the requirement to obtain a hazardous waste storage license, Lamp Recyclers must be in compliance with the conditions of the Wisconsin Administrative Code s. NR 662.034(1) and (3) [40 CFR § 262.34(a) and (c)]. Specifically, we find that Lamp Recyclers is in noncompliance with the following conditions for the storage license exemption, and in violation of the following requirements:

1. In order to avoid the need for a hazardous waste storage license, a large quantity generator using satellite accumulation containers must always keep the containers closed except when it is necessary to add or remove waste. See, WAC ss. NR 662.034(3)(a)(1) and 665.0173(1). [40 CFR §§ 262.34(c)(1)(i), 265.173(a)]. This is also a requirement of owners and operators of hazardous waste storage facilities that

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use hazardous waste containers, under s.NR 664.0173(1) [40 CFR § 264.173(a)]. At the time of the inspection, a 55-gallon container accumulating waste mercury ampules from manually broken used fluorescent lamps was open and waste was not being added to or removed from it. Lamp Recyclers, therefore, failed to comply with the above-mentioned condition for a storage license exemption, and violated the storage facility container closure requirement.

2. In order to avoid the need for a hazardous waste storage license, a large quantity generator using satellite containers to accumulate hazardous waste must label the containers with the words "Hazardous Waste," or with other words that identify the contents of the containers. See, WAC ss. NR 662.034(3)(a)(2) [40 CFR § 262.34(c)(1)(ii)]. At the time of the inspection, a 55-gallon container accumulating waste mercury ampules from manually broken used fluorescent lamps and 55-gallon container accumulating mercury powder from the first collection point on the bulb crusher were not labeled as "Hazardous Waste" or with other words that identify the contents of the container. Lamp Recyclers, therefore, failed to comply with the above-mentioned condition for a storage license exemption.

3. In order to avoid the need for a hazardous waste storage license, a large quantity generator using satellite containers to accumulate hazardous waste must date the containers accumulating waste in excess of 55-gallons with the date the excess amount began accumulating. See, WAC ss. NR 662.034(3)(b) [40 CFR § 262.34(c)(2)]. At the time of the inspection, a 55-gallon full container of waste mercury powder at the first collection point on the bulb crusher was not dated with the date excess amount began accumulating. Lamp Recyclers, therefore, failed to comply with the above-mentioned condition for a storage license exemption.

4. A large quantity generator who accumulates hazardous waste on-site for 90 days or fewer, and who does not meet the conditions for a license exemption set forth in WAC ss. NR 662.034(1) and (3) is an operator of a hazardous waste storage facility, and is required to obtain a hazardous waste storage license. See, WAC ss. NR 670.001(3) and NR 670.010(1) and (4) [40 CFR §§ 270.1(c), and 270.10(a), (d)]. Upon failing to comply with the conditions for a license exemption specified in paragraphs 1 through 3, above, Lamp Recyclers was required to obtain a hazardous waste storage license. Lamp Recyclers did not obtain a hazardous waste storage license, and, therefore, violated the licensing requirements of WAC ss. NR 670.001(3) and 670.010(1) and (4) [40 CFR §§ 270.1(c), and 270.10(a), (d)].

At this time, EPA is not requiring Lamp Recyclers to apply for either a Wisconsin storage license or EPA storage permit, so long as it immediately establishes compliance with the conditions for an exemption outlined above. According to Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), EPA may issue an order assessing a civil penalty for any past or current violation requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a response in writing to this office no later than thirty (30) days after receipt of

this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above conditions and requirements.

You should submit your response to Derrick Samaranski, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604. If you have any questions regarding this letter, please contact Derrick Samaranski, of my staff at (312) 886-7812.

Sincerely,

Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Jennifer Easterly, WDNR, Jennifer.Easterly@wisconsin.gov
Michael Ellenbecker, WDNR, Michael.Ellenbecker@wisconsin.gov

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5, LCD, RCRA BRANCH, LR-8J
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME:	Lamp Recyclers, Inc.
EPA ID No.:	WIR000125831
ADDRESS:	3055 Holmgren Way Green Bay, Wisconsin 54304
DATE OF INSPECTION:	February 26, 2014
EPA INSPECTOR:	Derrick Samaranski, LCD, RCRA, CS2

PREPARED BY: Derrick Samaranski — 05/08/2014 — **Date Completed**

ACCEPTED BY: **Julie Morris, Chief**
Compliance Section 2 — 6/9/14 — **Date**

Purpose of Inspection

I conducted an unannounced Compliance Evaluation Inspection (CEI or "Inspection") of Lamp Recyclers Inc. ("Lamp Recyclers" or "Facility") located in Green Bay, Wisconsin, on February 26, 2014. This CEI was an evaluation of Lamp Recyclers' compliance with hazardous and universal waste regulations found at Wisconsin Administrative Code (WAC) and the Code of Federal Regulations (CFR). The RCRA CEI was led by the U.S. Environmental Protection Agency.

Participants

Inspector(s):

Derrick Samaranski, U.S. EPA

Site Representatives:

Rich Stern, Vice President of Operations
Brett Reschke, Office Director

Introduction

I arrived at the location of the Lamp Recyclers facility at 11:30 AM, and proceeded to speak with Mr. Reschke. I presented my official credentials, gave Mr. Reschke my business card, and explained the purpose of my visit. During the opening conference with Mr. Reschke, I asked for a description of the Lamp Recyclers operations and a listing of solid and hazardous waste streams generated by the facility. During this time we were joined by Mr. Stern who identified himself as the facility's environmental contact. I presented my credential to Mr. Stern and explained the purpose of my visit.

Site Description

The following information about Lamp Recyclers is based on the personal observations of the EPA inspector and on representations made during the Inspection by the Facility personnel identified above or is otherwise specified.

The Lamp Recyclers facility is a large quantity universal waste handler/processor which receives used lamps and batteries, electronic wastes, latex paint, scrap wire, PCB and non-PCB ballast, medical waste, and used consumer type batteries. Lamp Recyclers processes used mercury bulbs and lamps in a lamp crusher unit which separates the metal, mercury powder, and glass. The lamp crushing operation is conducted within 24-hour time period from the receipt of the waste on-site. In addition to the lamp crushing operation Lamp Recyclers sorts, segregates, and recovers valuable materials or metals from the received universal or electronic wastes received at the facility. As a result of lamp rushing operations Lamp Recyclers generates hazardous waste

mercury powder waste (D009) and mercury contaminated debris (D009) and operates as a large quantity generator of hazardous waste. Lamp Recyclers maintains 25-day conditional PCB storage area, hazardous and universal waste transportation licenses, and operates as a 10-day hazardous waste transfer facility. Most of the hazardous waste managed by Lamp Recyclers comes from handling or generation of universal wastes.

Lamp Recyclers has operated at the current location since 2006 and is privately owned. Lamp Recyclers operates one shift Monday through Friday from 8-4 PM, employs fifteen people, and occupies 12,000 square feet of area. Lamp Recyclers used analytical testing to conduct waste determinations of its waste streams.

Site Tour

The site walk-through of the facility started at 12:30 PM and began with the visit to the universal waste storage/staging area. Lamp Recyclers also uses this area for sorting incoming electronic wastes based on their type and value. The universal wastes are stored in 55-gallon drums, cubic yard cardboard boxes, and wooden pallets, which are stored on racks along the walls of the storage/staging room. During my visit to the storage/staging area, I observed an open and unlabeled cardboard box container that stored several electronic components. Mr. Stern explained that the contents of the box were being sorted. Before we left the area, the box was labeled with the universal waste label and expired electronics. In the same area, I also observed two 55-gallon drums which were identified by Mr. Stern as holding broken bulbs. Mr. Stern had an employee pull the pallet with drums away from the storage area, so that I could inspect the labels. Both drums were labeled as "Hazardous Waste" mercury waste with accumulation start dates of 02/25/2014. Lamp Recyclers operates as a transporter and transfer facility for hazardous waste. The broken lamps were designated for transport to WM Mercury Waste in Union Grove, WI on 03/03/2014. I additionally observed and photographed storage containers on racks along the north wall of the storage/staging room. I observed a pallet of used computer server racks, cardboard container of lead acid batteries, pallet of shrink-wrapped boxes of circuit boards, and cardboard, metal and plastic drums of various types of batteries. The used servers were not labeled and according to Mr. Stern were being staged for sorting. The cardboard box of lead acid batteries was labeled as "Universal Waste" and dated 02/25/2014. Contacts of the lead acid batteries were either taped or covered to prevent discharge of energy. The pallet of shrink wrapped circuit board boxes was labeled "circuit boards." The inspected drum containers of used batteries were labeled with "Universal Waste" labels, which also identified the type of batteries being stored in the container. The labels on the drums identified nickel cadmium, lithium ion, and nickel metal hydrite batteries. The oldest observed accumulation start date was 02/07/2014. Several used battery drums were not easily accessible for visual verification of proper labeling and/or dating as they were being tightly stored on storage racks. In the same area, I also observed a container that was storing non-PCB capacitors.

From the used battery storage/staging area, we continued the tour of the facility by visiting Lamp Recyclers PCB storage area. During my visit, Lamp Recyclers was storing five 55-gallon drums, 30-gallon drum, and 5-gallon pail of PCB wastes. All of the PCB waste containers were labeled

and dated. According to Mr. Stern Lamp Recyclers has been issued a 35-day storage permit for PCB wastes from the Wisconsin Department of Natural Resources.

The site walk-through of the storage/staging area ended with a visit to the pallet rack, which stored various computer components in small containers. I observed used laptops, hard drives, and disk drives. None of the observed containers or items were labeled. Mr. Stern explained that the wastes were being staged to be sorted.

Before visiting the universal lamp crusher area, I visited the facility's shipping and receiving dock. No issues of concern were noted during the visit to the shipping and receiving dock.

Next, we continued the tour of the facility operations by visiting the universal lamp crusher area where Lamp Recyclers operates an automated lamp-crushing unit and conducts manual crushing of lamps that cannot be fed through the lamp crusher. Lamp Recyclers also uses part of the lamp crushing room for staging of used electronic equipment, non-PCB ballast, and storage of empty containers. I counted approximately nine gaylord boxes of electronic wastes. Mr. Stern informed me that the e-waste arrived at the facility on 02/24/2014 and was waiting to be sorted. None of the containers with e-waste appeared to be labeled.

After looking at the staged containers of e-waste, and manual lamp crushing area, we continued the inspection of the lamp crushing room by visiting facility's 90-day hazardous waste storage. During our visit, I observed accumulation of a 55-gallon drum of mercury waste powder and a 55-gallon drum of mercury containing equipment. The mercury powder drum was labeled as "Hazardous Waste" and dated with an accumulation start date of 02/24/2014. The mercury containing equipment drum was labeled as "Universal Waste" and was dated 08/27/2013.

Next, I inspected the lamp crusher unit which is connected to a carbon filtration system to capture mercury powders. The carbon filtration system is monitored for the breakthrough at the exhaust at which point the filters are offered for disposal to Mercury Waste. Operation of the lamp crushing unit generates fine mercury powder which is collected in 55-gallon satellite drums, metal caps from the broken lamps, and fine powdered glass which is collected in a 30-cubic yard trapped roll-off box. At the time of the visit, I observed collection of waste mercury powder of the lamp crushing unit at two separate locations. The first drum collects the mercury powder when lamps are first broken and the second drum when the fine ground glass is separated from the waste mercury powder. The first waste mercury powder drum was labeled as "Hazardous Waste" and connected to the lamp crusher unit. Next to the first waste mercury drum was located an unlabeled 55-gallon drum which was identified by Mr. Stern as a holding waste mercury powder. Mr. Stern explained that the unlabeled drum of waste mercury powder was full and recently replaced the waste mercury powder currently collecting waste mercury powder. The second waste mercury collection area had a 55-gallon drum labeled as "Hazardous Waste" and connected to the lamp crushing equipment. Next to the second waste mercury drum I observed an empty unlabeled 55-gallon drum which was identified as a replacement drum. Before leaving the lamp crushing waste mercury powder collection area I informed Mr. Stern that the full

unlabeled drum of waste mercury powder needed to be moved to the 90-day storage area within three days of becoming full and needed to be properly labeled and dated.

The site walk-through of the facility ended with a visit to the outdoor cooled semi-trailer which is used by the facility for storage of medical wastes prior to disposal. Lamp Recyclers offers medical waste pick-up and disposal at 1:50 PM.

Records Review

For the records review I requested to see the following: hazardous waste manifest records for off-site shipments for the last three years (2014 – 2011), waste stream determinations, training records, contingency plan, copies of the last three annual hazardous waste reports submitted to WDNR, weekly inspections of the hazardous waste accumulation area, hazardous waste transporter manifests, land disposal restriction forms (LDRs), 2013 lamp crushing area air testing results, and 2013 universal waste acceptance/management/disposal logs.

First, I reviewed Lamp Recyclers' hazardous waste manifests. Lamp Recyclers offers its D009 hazardous mercury waste which includes HEPA filters, mercury powder, and crushed bulb glass to WM Mercury Waste Inc., WIR000000356. Each of the reviewed hazardous waste manifests was accompanied by a copy of the LDR form. I also reviewed available transporter hazardous waste manifests which covered a period from 2014 to 2011. The reviewed transporter manifests revealed that Lamp Recyclers transports generator's mercury contaminated wastes to Veolia (WID988566543), WM Mercury Waste Inc. (WIR000000356), or Badger Disposal (WID988580056). No issues of concern were noted as a result of the hazardous waste manifest review.

Next, I reviewed the WM Mercury Waste Inc. waste profile for the crushed/broken lamps which Lamp Recyclers transports for disposal. Lamp Recyclers regularly collects samples of waste mercury powder and spent activated carbon filter generated at the facility and analyzes it for hazardous waste constituents. Fine glass generated from lamp crushing operations is also tested regularly. I also reviewed several Lamp Recyclers' waste profiles for non-PCB and PCB wastes which the facility manages for some of its customers. Along with the PCB waste profiles I reviewed two 2014 manifests for disposal of customers PCB wastes to Badger Disposal (WID988580056).

Mr. Stern also showed me a log of air testing results taken from the lamp crushing room with an air analyzer and maintained by the facility. I reviewed daily records going back to 12/03/2013. Mr. Stern explained that air in the lamp crushing room is analyzed every day the equipment is operated. In addition to testing air in the lamp crushing room, Lamp Recyclers also conducts annual soil testing around its facility to determine if mercury has migrated outside of the facility. According to Mr. Stern the air samples and soil samples have not indicated the presence of mercury above regulatory levels.

Next, I reviewed Lamp Recyclers 2013 and 2012 Annual Hazardous Waste Reports which the facility filed with WDNR. The 2013 report was filed on 01/23/2014 and listed 27,471 pounds of generated hazardous waste. In 2012 Lamp Recyclers generated 25,334 pounds of hazardous waste.

After reviewing the Annual Hazardous Waste Reports, I reviewed Lamp Recyclers' 2014 (on-going), 2013 (completed), and 2012 (completed) employee training records, and inspection logs. Lamp Recyclers offers training to approximately nine of its employees. Lamp Recyclers site inspections cover its 90-day hazardous waste storage area, PCB storage area, and used bulb containers. Inspections are conducted on a weekly basis and Mr. Stern is responsible for conducting and recording the inspections. As a part of the inspection log review, I also reviewed part of the pick-up log which Lamp Recyclers maintains for picking up latex paints.

The records review ended with the review of bills of lading Lamp Recyclers issued to its customers during pick-ups of universal wastes. I reviewed a sample of records which covered year 2013 and requested copies of monthly log sheets which covered Lamp Recyclers activities during 2014-2012 (e-mailed during CEI). I also reviewed a sample of the records which covered year 2013 and included shipments of universal wastes to several Lamp Recyclers' largest customers (waste basis): Recycle that Stuff, Inmetco, 1st American Metal Corp, Dynamic, Arco, ALCOA, and Sadoff Metal (metal scrap). I also requested a copy of the facility's contingency plan which was e-mailed to me after the CEI.

Closing Conference

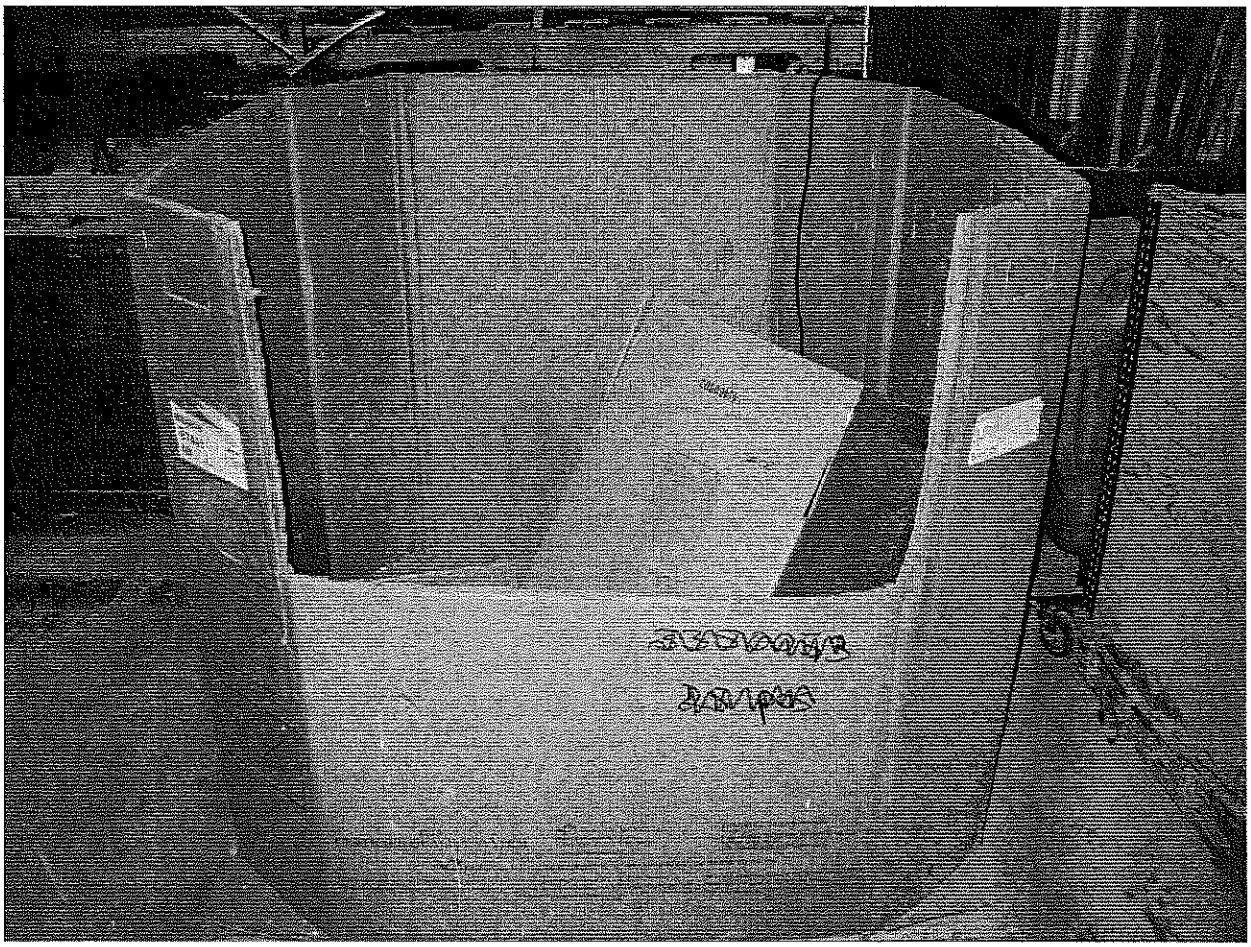
For the inspection close-out conference I explained to the facility that I may request additional records after review of the monthly logs. I gave the facility representative Small Business Resource Sheet and Wisconsin's Solid and Hazardous Waste Education Center (SHWEC) handout. During the closeout conference, I discussed with Lamp Recyclers' representative labeling requirements for satellite containers and silica glass air testing. The inspection of the facility ended at 4:15 PM.

Attachments

A. Photographs
B. Checklists
C. List of Documents Copied/Obtained During Inspection
D. CD of All Photos Taken During the Inspection

ATTACHMENT A
Photographs

Lamp Recyclers, Inc.
WIR000125831



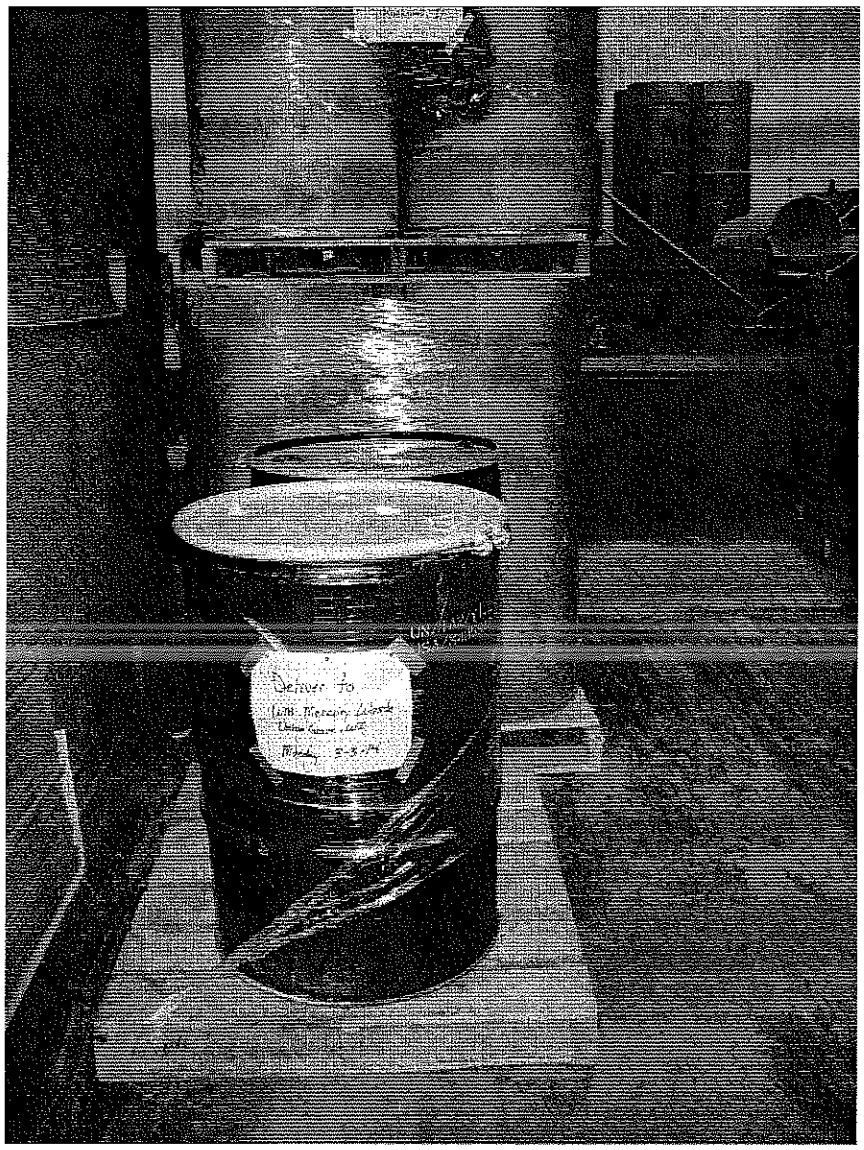
Photograph Number: 1

Photographer: Derrick Samaranski

Date and Time: 2/26/2014 12:30 PM

Photograph Description: Open and unlabeled container accumulating electronic wastes in the facility's storage/staging area.

Lamp Recyclers, Inc.
WIR000125831



Photograph Number: 2

Photographer: Derrick Samaranski

Date and Time: 2/26/2014 12:32 PM

Photograph Description: Two 55-gallon drums of used broken lamps. Arrived at the facility on 02/24/2014.

Lamp Recyclers, Inc.
WIR000125831

Photograph Number: 3

Photographer: Derrick Samaranski

Date and Time: 2/26/2014 12:39 PM

Photograph Description: Two drums of broken lamps pictured previously in photo #2 showing hazardous waste labels.

Lamp Recyclers, Inc.
WIR000125831

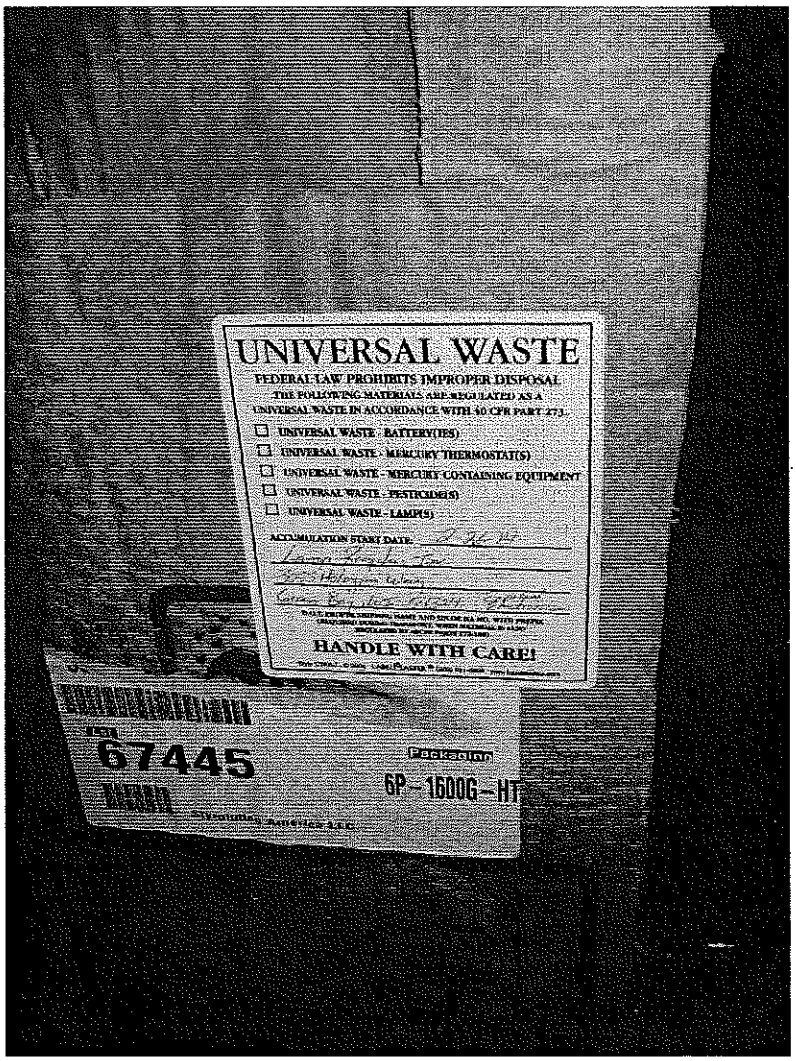
Photograph Number: 4

Photographer: Derrick Samaranski

Date and Time: 2/26/2014 12:40 PM

Photograph Description: Picture of the e-waste container pictured previously in photo #1, after it has been labeled by the facility personnel.

Lamp Recyclers, Inc.
WIR000125831



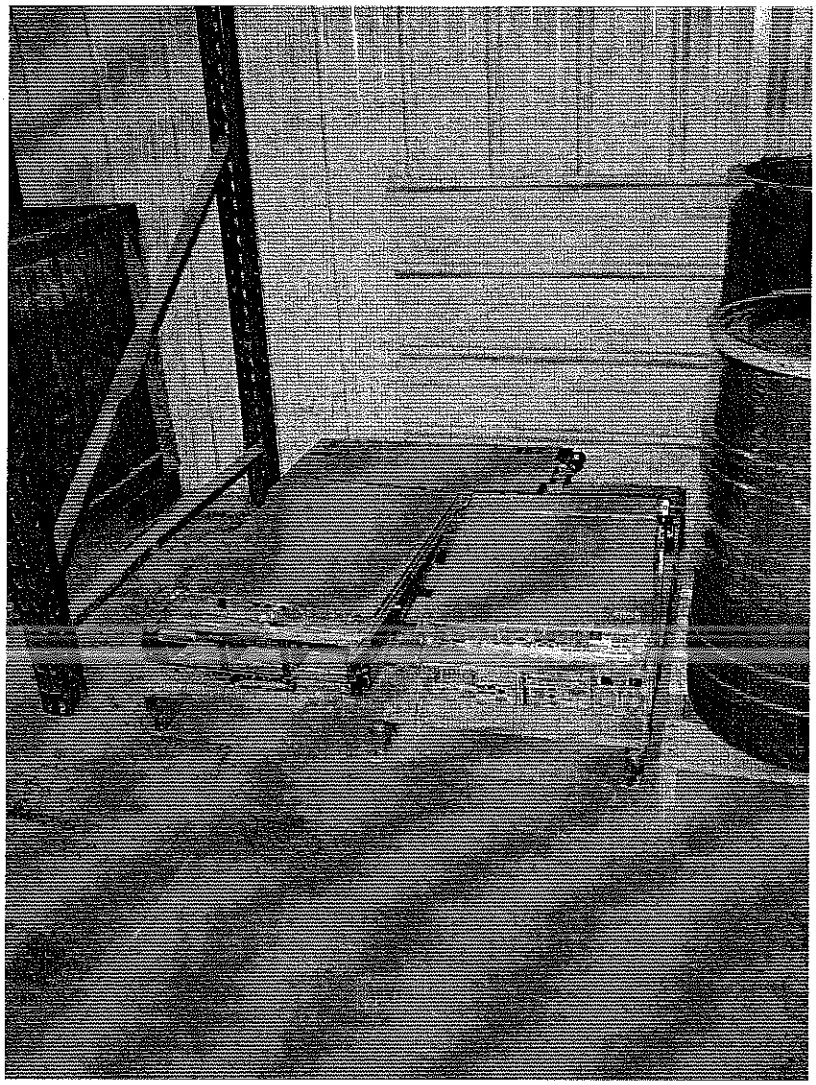
Photograph Number: 5

Photographer: Derrick Samaranski

Date and Time: 2/26/2014 12:40 PM

Photograph Description: Close-up of the label on the e-waste container pictured in the photo #4.

Lamp Recyclers, Inc.
WIR000125831



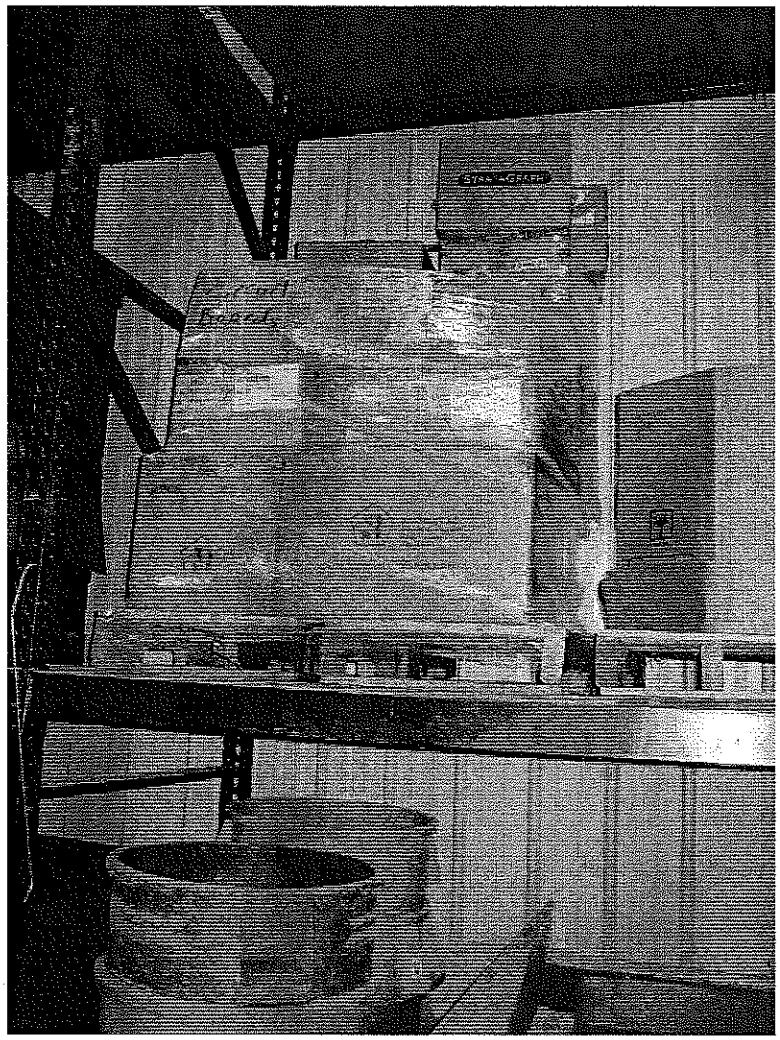
Photograph Number: 6

Photographer: Derrick Samaranski

Date and Time: 2/26/2014 12:41 PM

Photograph Description: Staged used computer server racks.

Lamp Recyclers, Inc.
WIR000125831



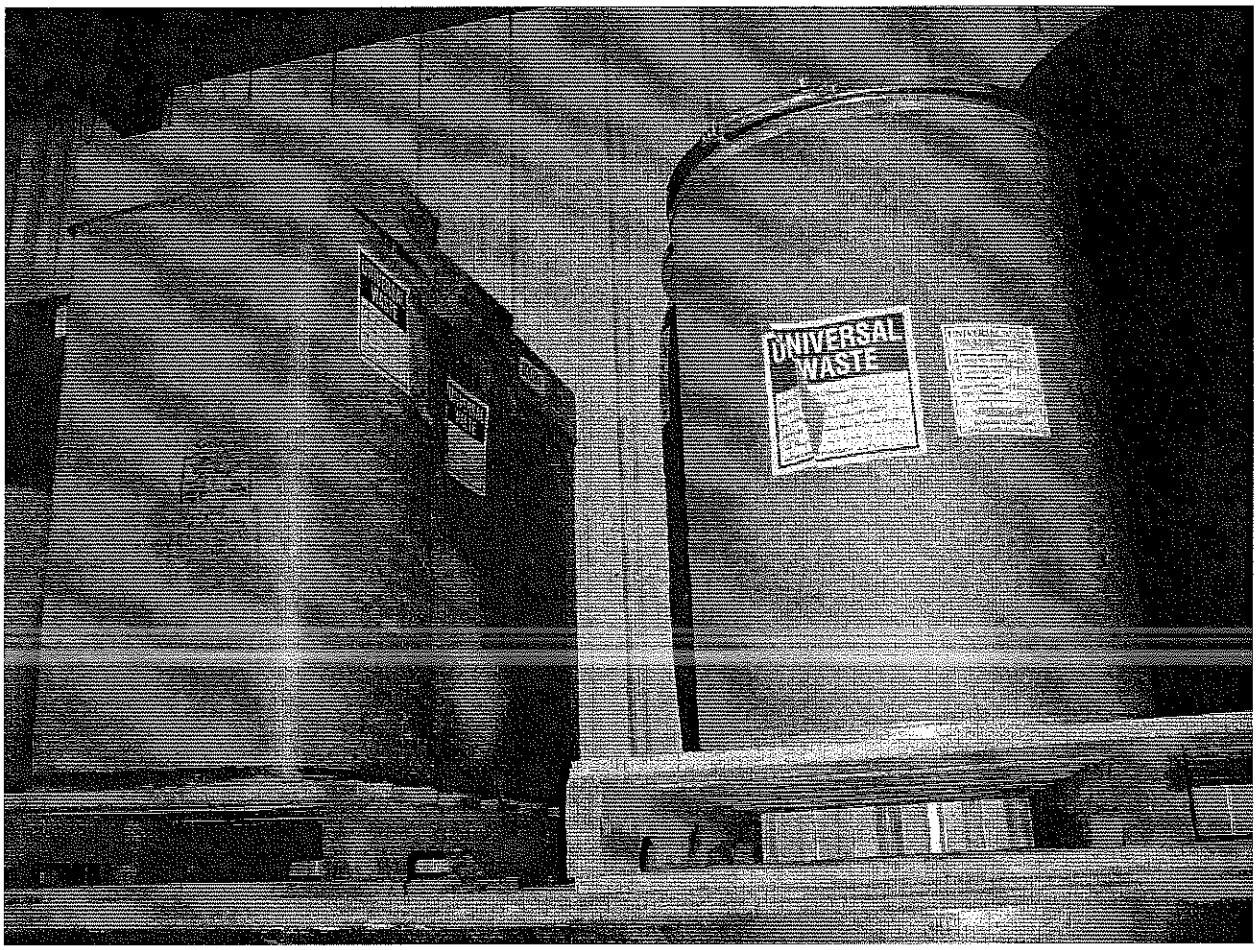
Photograph Number: 7

Photographer: Derrick Samaranski

Date and Time: 2/26/2014 12:53 PM

Photograph Description: Pallet of boxes of circuit boards stored prior to shipment.

Lamp Recyclers, Inc.
WIR000125831



Photograph Number: 8

Photographer: Derrick Samaranski

Date and Time: 2/26/2014 12:54 PM

Photograph Description: Containers of universal waste batteries.

Lamp Recyclers, Inc.
WIR000125831

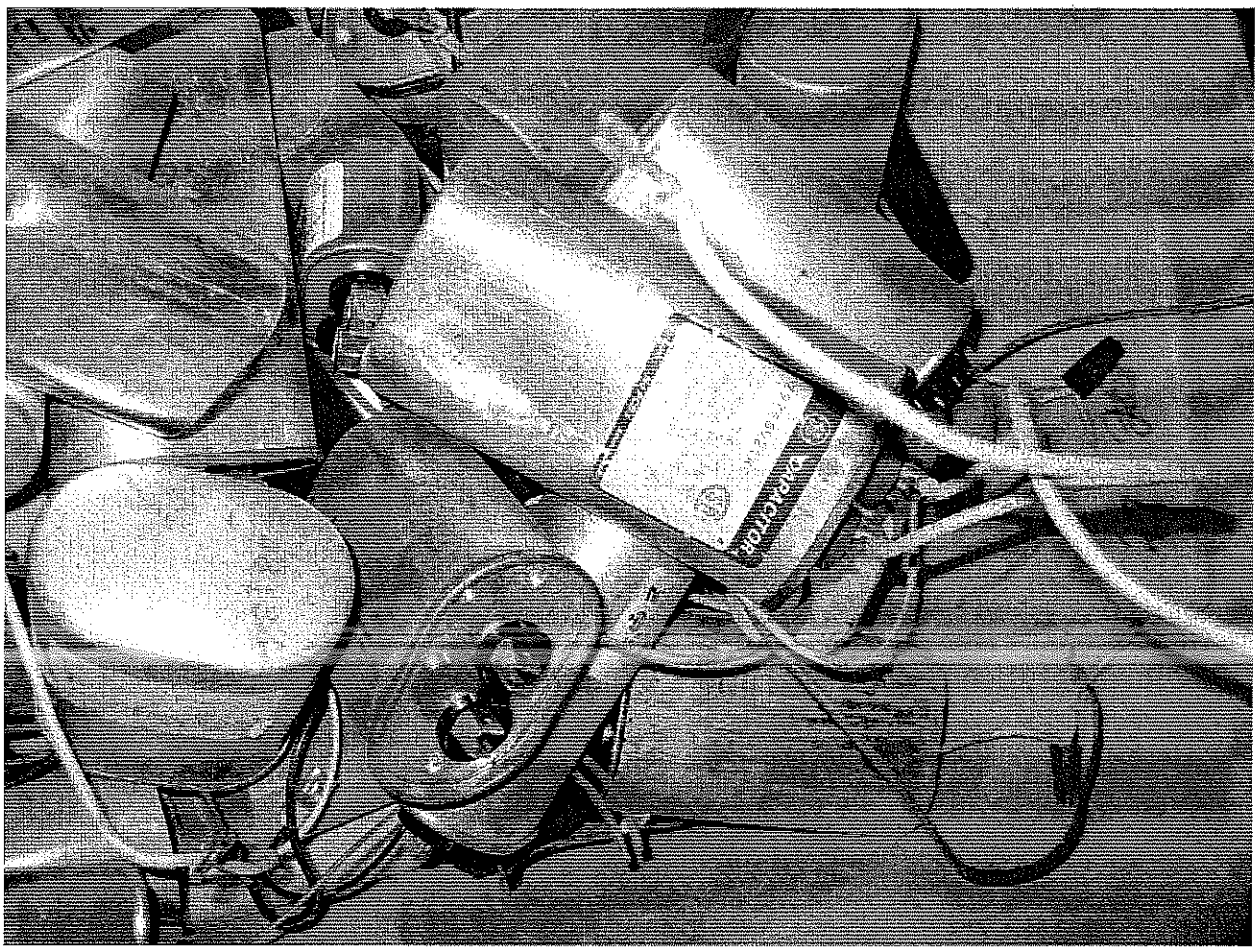
Photograph Number: 9

Photographer: Derrick Samaranski

Date and Time: 2/26/2014 12:55 PM

Photograph Description: Additional view of the containers accumulating universal waste batteries pictured in photo #8.

Lamp Recyclers, Inc.
WIR000125831



Photograph Number: 10

Photographer: Derrick Samaranski

Date and Time: 2/26/2014 1:03 PM

Photograph Description: Box accumulating non-PCB capacitors.

Lamp Recyclers, Inc.
WIR000125831

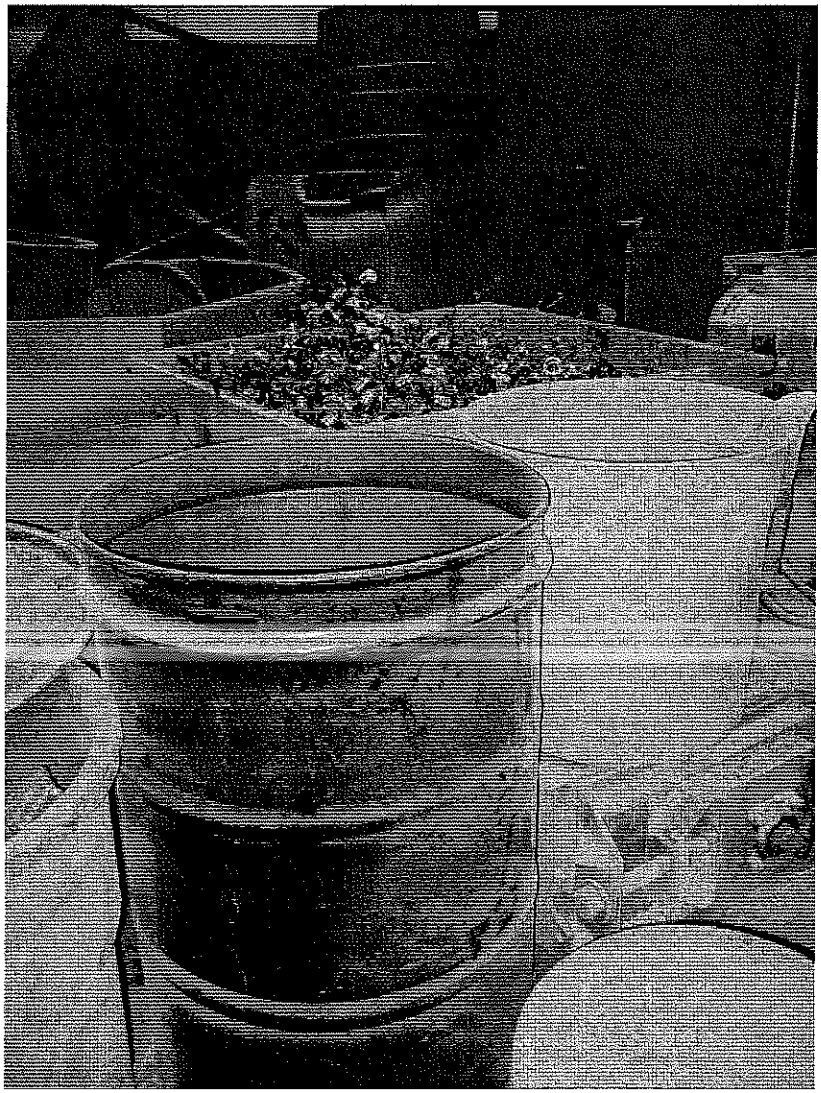
Photograph Number: 11

Photographer: Derrick Samaranski

Date and Time: 2/26/2014 1:17 PM

Photograph Description: Containers of fluorescent lamps staged for processing in the lamp crushing room and gaylord boxes of electronic wastes staged to be sorted.

Lamp Recyclers, Inc.
WIR000125831



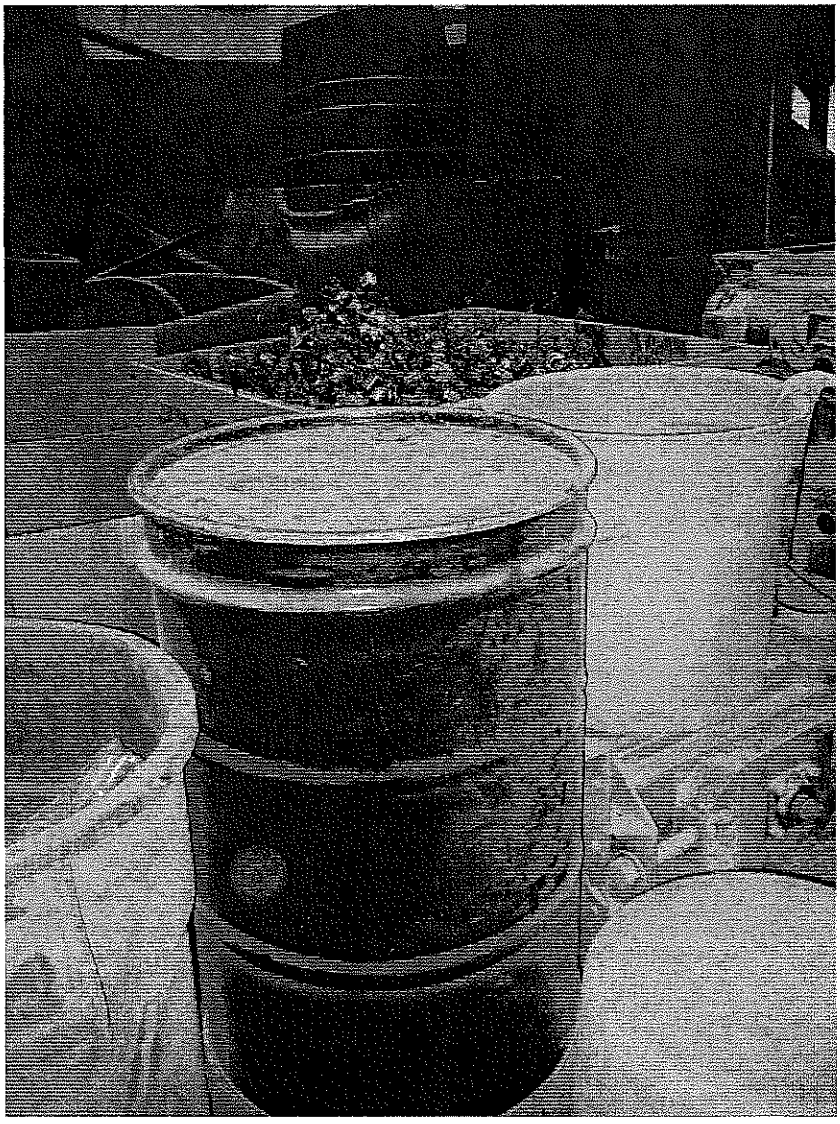
Photograph Number: 12

Photographer: Derrick Samaranski

Date and Time: 2/26/2014 1:23 PM

Photograph Description: Open unlabeled satellite container accumulating mercy ampules from manually broken used bulbs. Not in used at the time of the visit.

Lamp Recyclers, Inc.
WIR000125831



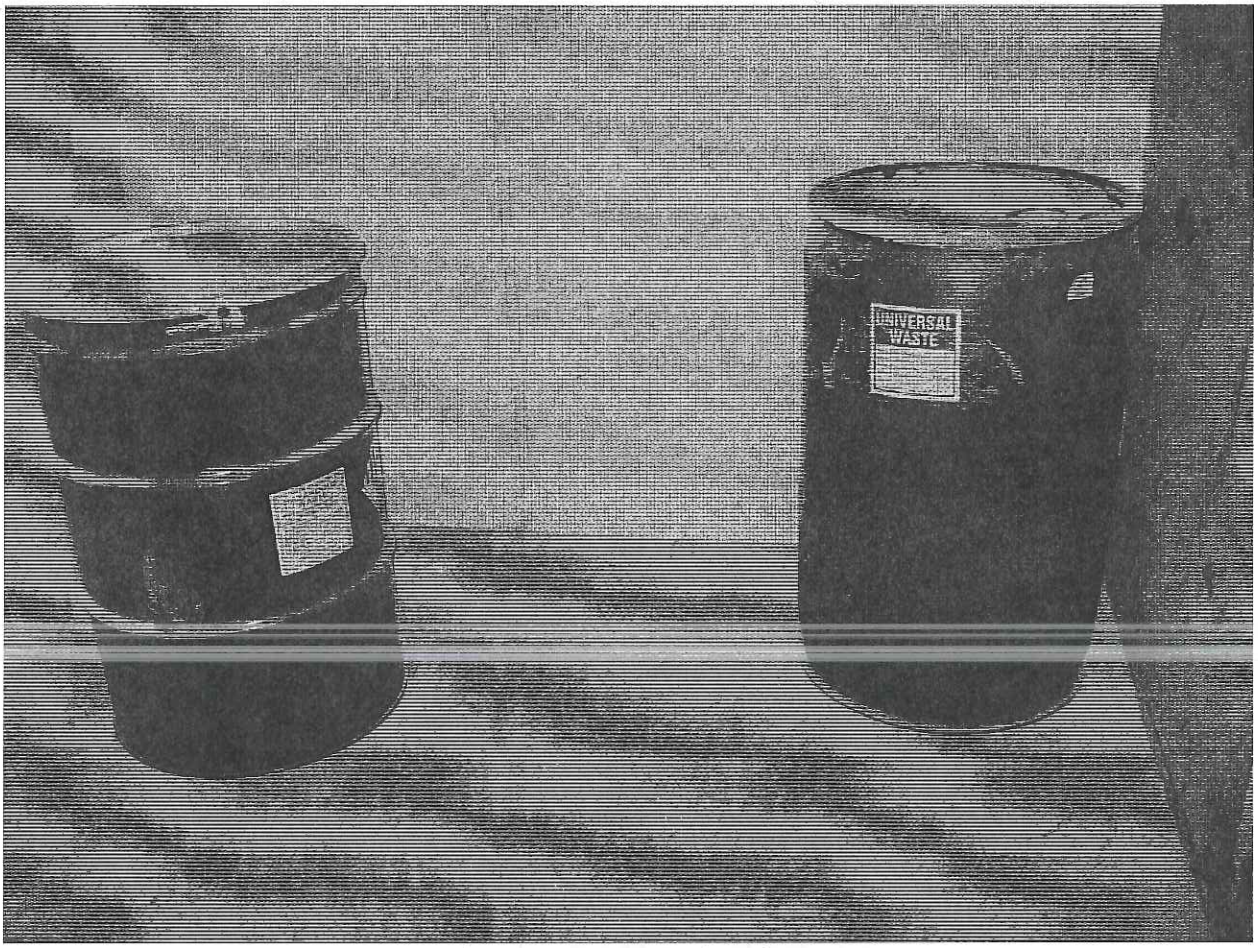
Photograph Number: 12

Photographer: Derrick Samaranski

Date and Time: 2/26/2014 1:23 PM

Photograph Description: Satellite container accumulating mercy ampules from manually broken used bulbs previously pictured in photo# 11, after it has been closed.

Lamp Recyclers, Inc.
WIR000125831



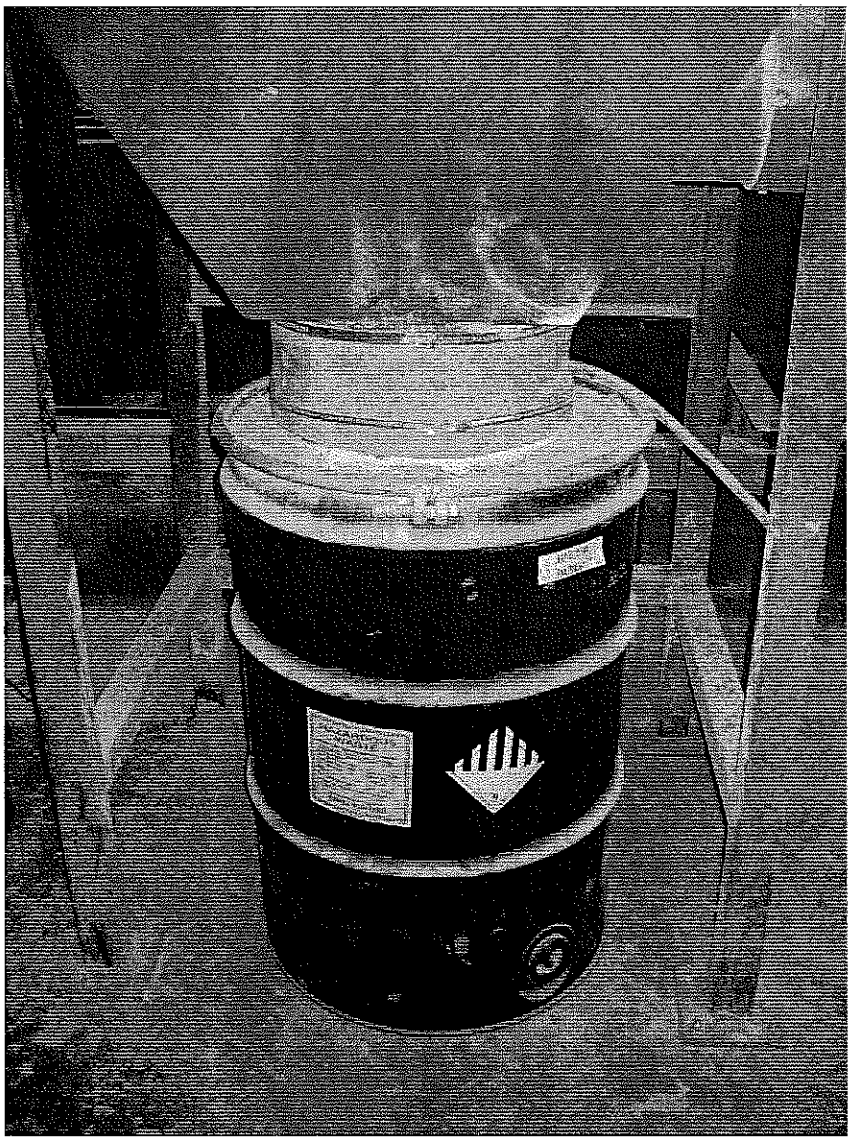
Photograph Number: 13

Photographer: Derrick Samaranski

Date and Time: 2/26/2014 1:25 PM

Photograph Description: Lamp Recyclers 90-day hazardous waste storage area with one 55-gallon container of mercury powder waste and one drum of mercury containing equipment.

Lamp Recyclers, Inc.
WIR000125831



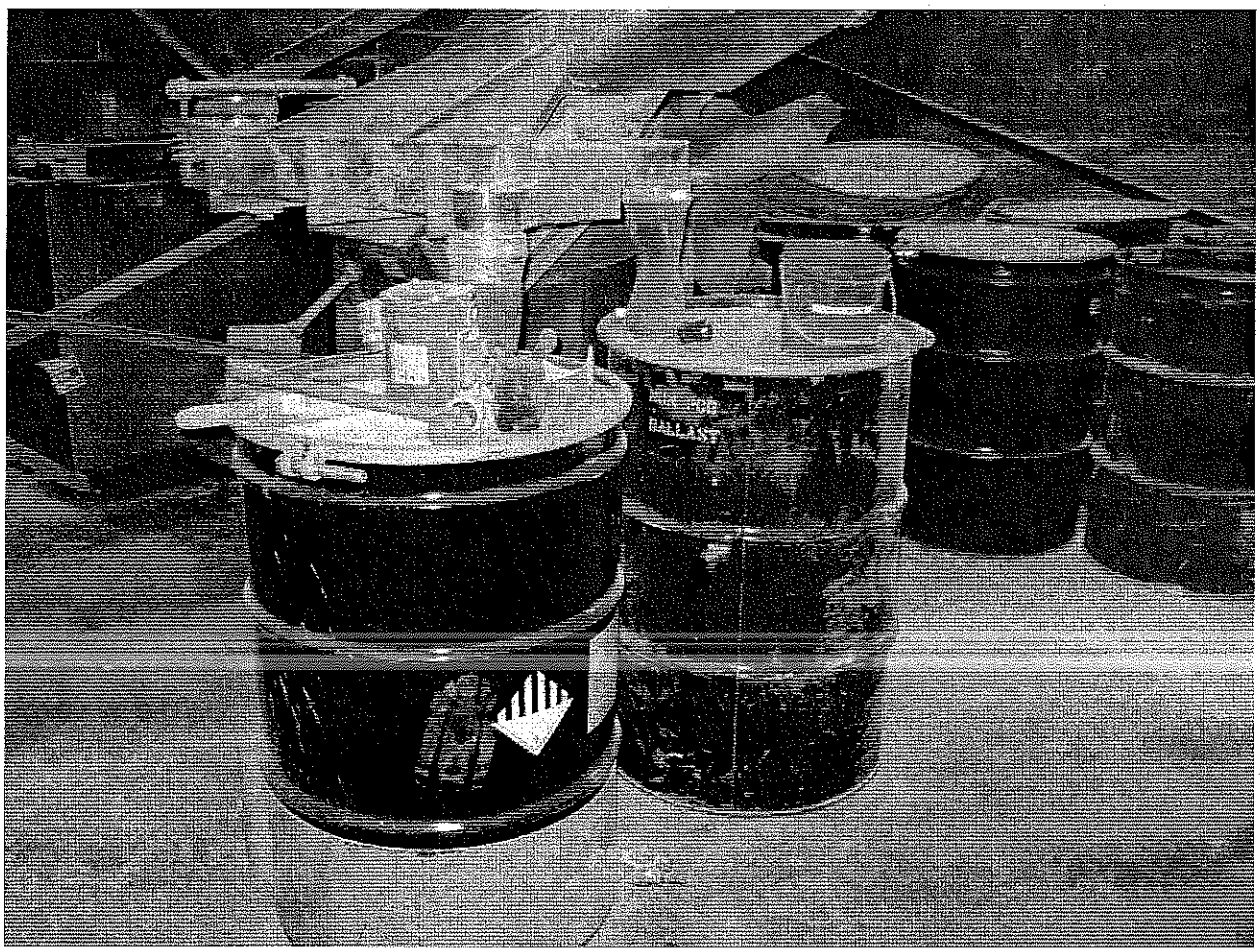
Photograph Number: 14

Photographer: Derrick Samaranski

Date and Time: 2/26/2014 1:29 PM

Photograph Description: Satellite container accumulating mercury powder (first collection point).

Lamp Recyclers, Inc.
WIR000125831



Photograph Number: 15

Photographer: Derrick Samaranski

Date and Time: 2/26/2014 1:32 PM

Photograph Description: Satellite container accumulating mercury powder (second collection point) and an empty exchange drum staged behind it.

Lamp Recyclers, Inc.
WIR000125831

Photograph Number: 16

Photographer: Derrick Samaranski

Date and Time: 2/26/2014 1:32 PM

Photograph Description: Satellite container accumulating mercury powder (first collection point) and a full, unlabeled drum of mercury powder next to it.

ATTACHMENT C
Documents Copied

Document	Date
Copy of Hazardous Waste Manifests and LDRs for off-site shipments to WM Mercury (12/18/2013 – 02/10/2014)	02/26/2014
Copy of Lamp Recyclers Hazardous Waste Transporter Manifests (06/1/2011 – 02/25/2014)	02/26/2014
Copy of February 2014 PCB shipment Manifests	02/26/2014
Copy of Waste Determinations for Broken Lamps, Mercury Powder, Carbon Filters	02/26/2014
Copy of the Air Inspection Logs (12/2/2013 – 02/25/2014)	02/26/2014
Copy of the First Page of the 2013 Annual Hazardous Waste Report	02/26/2014
Copy of the Weekly Inspection Logs (12/27/13 -02/24/2014)	02/26/2014
Select Copies of Bills of Lading of Incoming Universal Wastes	02/26/2014
Select Copies of Bills of Lading of Outgoing Universal Wastes	02/26/2014
Copy of the Facility Layout	02/26/2014
Copy of the Contingency Plan	E-mailed 02/26/2014
Copies of 2012-2014 Monthly Universal Waste Acceptance Spreadsheets	E-mailed 02/26/2014
Copy of the Lamp Recyclers Audit Book	E-mailed 02/26/2014

LARGE QUANTITY GENERATOR INSPECTION

Revision: 03/19/2012
WASTE & MATERIALS MANAGEMENT PROGRAM

This Inspection Form, used for the inspection of facilities that generate over 1000 kg (2205 lbs) of non acute hazardous waste in a calendar month or over 1 kg of acute hazardous waste in a calendar month, evaluates compliance with Wisconsin's Hazardous Waste Management Rules (chapter NR 660 - 679, Wis. Admin. Code).

Section 1: Waste Information

A. Hazardous waste determination has been made on each solid waste generated.	Y	662.011 Photo☐
B. Waste determination was made correctly, considering the listed waste definitions and the characteristics of the waste, in light of the materials or processes used.	Y	662.011(3) Photo☐
C. Waste samples are analyzed by laboratories certified or registered under NR 149. Provide lab names and certification numbers.	Y	662.011(3)(a)1 Photo☐
D. Generator keeps records of all waste determinations on-site for at least three years from the date the waste was last sent to a storage, treatment or disposal facility.	Y	662.040(3) Photo☐
E. Generator submitted a notification form and obtained an EPA ID#. Note: A subsequent notification should be submitted when there is an ownership or name change.	Y	662.012 Photo☐

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

A. Generator initiated a manifest with all off-site shipments of hazardous waste.	Y	662.020(1) Photo☐
B. The manifest is used according to the instructions in the appendix to 40 CFR part 262.	Y	662.020(1) Photo☐
C. The facility designated on the manifest is permitted or licensed to accept the waste.	Y	662.020(2) Photo☐
D. For out-of-state shipments, a copy of the manifest is sent to the department within 30 days of receiving the signed copy from the designated facility.	NA	662.023(3) Photo☐
E. Manifest continuation form, EPA form 8700-22A, is prepared according to the instructions in the appendix of 40 CFR part 262.	NA	662.020(1) Photo☐
F. If the generator received a shipment back as a rejected load, the returned waste was accumulated in compliance with the container or tank standards for less than 90 days.	NA	662.034(13) Photo☐
G. Upon receipt of the rejected shipment, the generator signed EITHER of the following: 1. Manifest Item 18c if the transporter returned the shipment using the original manifest. 2. Manifest Item 20 if the transporter returned the shipment using a new manifest.	NA	662.034(13) Photo☐
H. A copy of the manifest signed by the generator is retained until the signed copy from the designated facility is received.	Y	662.040(1) Photo☐
I. Copy of each manifest is kept for at least three years from the date of shipment.	Y	662.040(1) Photo☐
J. Hazardous waste is packaged according to applicable DOT requirements before transport.	Y	662.030 Photo☐

LARGE QUANTITY GENERATOR INSPECTION

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

K. Hazardous waste is labeled according to applicable DOT requirements before transport.	Y	662.031 Photo ☐
L. Hazardous waste is marked according to applicable DOT requirements before transport.	Y	662.032(1) Photo ☐
M. Containers of 119 gallons and less are marked with the "Hazardous Waste-Federal law prohibit improper disposal" label before transport.	Y	662.032(2) Photo ☐
N. Placards are offered to the initial transporter. Placards for Corrosive.	Y	662.033 Photo ☐

Section 3: Land Disposal Restrictions

A. Generator determined if each waste is prohibited from land disposal by lab analysis or generator knowledge.	Y	668.07(1) Photo ☐
B. Generator complies with the prohibition against dilution of wastes.	Y	668.03 Photo ☐
C. A one-time written notice was sent to each treatment, storage or disposal facility with the initial waste shipment.	Y	668.07(1) Photo ☐
D. A new notification is sent to the TSD and maintained in the generator file when the waste or receiving facility changes.	Y	668.07(1) Photo ☐
E. If the waste MEETS treatment standards, the LDR notice certifies wastes may be land disposed without further treatment.	NA	668.07(1) Photo ☐
F. If the waste EXCEEDS treatment standards, the LDR notice gives notification of appropriate treatment and applicable prohibitions.	Y	668.07(1) Photo ☐
G. A copy of the LDR notifications and certifications are retained for at least 3 years from the date the waste was last sent off-site.	Y	668.07(1)(h) Photo ☐
H. Underlying hazardous constituents have been identified for characteristic wastes.	Y	668.09(1) Photo ☐
I. Generator identifies EITHER of the following when the waste is both a listed and characterisitic waste: 1. The treatment standards for the listed waste code, in lieu of the treatment standard for the characteristic waste codes. 2. The treatment standards for all applicable listed and characteristic waste codes.	Y	668.09(2) Photo ☐
J. If waste is treated in containers or tanks, the generator meets BOTH of the following (NR 668.07(1)(e): 1. Developed a written waste analysis plan describing the procedures used to meet applicable LDR treatment standards. 2. Complies with the certification requirements in NR 668.07(1)(c).	NA	662.034(1)(d) Photo ☐

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Section 4: Annual Reports and Exception Reporting

A. Annual reports covering generator activities during the calendar year have been submitted to the Department by March 1 of the following year.	Y	662.041 Photo☐
B. Transporter or TSD is contacted if signed manifest is not received in 35 days.	NA	662.042(1) Photo☐
C. Exception report is submitted to the Department if a signed manifest is not received within 45 days.	NA	662.042(2) Photo☐
D. Copy of each annual report and exception report is kept for at least 3 years from the date of the report.	Y	662.040(2) Photo☐

Section 5: Preparedness and Prevention

A. Generator has ALL of the following, unless the equipment is not necessary for the types of wastes handled (NR 665.0032): 1. Device to summon emergency assistance (e.g., telephone, 2 way radio). 2. Internal communications and alarm systems. Y 3. Portable fire extinguishers. Y 4. Fire control equipment, including special extinguishing equipment. 5. Spill control equipment. Y 6. Decontamination equipment (e.g., eyewash, shower). Y 7. Water at adequate volume and pressure to supply water spray systems. Y	Y	662.034(1)(d) Photo☐
B. All of the above emergency equipment is tested and maintained to assure its proper operation in an emergency (NR 665.0033). Y, weekly	Y	662.034(1)(d) Photo☐
C. There is immediate access to internal or external alarms or an emergency communication device in hazardous waste handling areas (NR 665.0034). Y	Y	662.034(1)(d) Photo☐
D. Generator has made ALL of the following arrangements with emergency organizations (NR 665.0037): 1. Primary and support roles have been defined if multiple police and fire departments could respond to an emergency. 2. Police, fire and emergency response teams are familiar with the site layout, hazards of the waste handled, places where personnel work, entrances and roads in the site and possible evacuation routes. 3. Agreements are made with emergency response contractors and equipment suppliers. 4. Local hospitals are familiar with the properties of wastes handled and the types of injuries or illnesses that could result from an emergency.	Y	662.034(1)(d) Photo☐
E. Aisle space provided throughout the facility to allow for the unobstructed movement of personnel and all emergency equipment (NR 665.0035).	Y	662.034(1)(d) Photo☐

Section 6: Contingency Plan and Emergency Procedures

A. Generator has a written contingency plan, amended SPCC plan or other emergency plan that will be implemented immediately in the event of a fire, explosion or hazardous waste discharge (NR 665.0051). If there is no written plan go to question 7.A.	Y	662.034(1)(d) Photo☐

Section 6: Contingency Plan and Emergency Procedures

B. Generator has amended a SPCC plan or other emergency plan so it sufficiently incorporates hazardous waste management provisions (NR 665.0052(2)).	NA	662.034(1)(d) Photo ☐
C. Copies of the contingency plan and all revisions have been made available to police, fire, hospital and emergency response teams. (NR 665.0052(3)).	Y	662.034(1)(d) Photo ☐
D. Contingency plan was amended due to ANY of the following (NR 665.0054): 1. Contingency plan failed in an emergency. 2. Change in site design, construction, O&M, or other circumstances which affect emergency response. 3. Emergency coordinators changed. 4. Emergency equipment changed.	NA	662.034(1)(d) Photo ☐
E. Contingency plan identifies an emergency coordinator who meets ALL of the following (NR 665.0055): 1. Available or on call to coordinate emergency response measures. 2. Familiar with all aspects of site activities and the contingency plan. 3. Has authority to commit the resources needed to carry out the contingency plan.	Y	662.034(1)(d) Photo ☐
F. Contingency plan includes ALL of the following (NR 665.0052): 1. Designation of the primary emergency coordinator, with alternates listed in the order of assuming responsibility. 2. Name, address and phone number, office and home, for each emergency coordinator. 3. Description of the arrangements agreed to by the police, fire, hospitals and emergency response teams to coordinate emergency services. 4. Evacuation plan for personnel including signal(s) to be used in the event of evacuation and alternate routes. 5. Actions facility personnel will take in response to a fire, explosion, or hazardous waste discharge. 6. List of emergency equipment at the site, including location, description and capabilities of each item.	Y	662.034(1)(d) Photo ☐
G. Contingency plan requires the emergency coordinator to do ALL of the following in the event of a fire, explosion, or discharge of hazardous wastes (NR 665.0056): 1. Activate internal alarms or communication systems. 2. Notify appropriate authorities, if their help is needed. 3. Identify the character, source, amount, and extent of discharged hazardous materials. 4. Assess hazards to human health and the environment. 5. If the incident threatens human health or the environment outside the facility, notify local authorities that evacuation may be necessary and notify the national response center (800-424-8802) and the division of emergency government (800-943-0003). 6. Take all reasonable measures necessary to ensure fires, explosions and discharges do not occur, reoccur, or spread. 7. Monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes, or other equipment if the site stops operation. 8. Provide for treating, storing, or disposing of recovered waste, contaminated soil, surface water, or other material. 9. Ensure wastes that are incompatible with the released material are not treated, stored or disposed until cleanup is completed. 10. Ensure that emergency equipment is clean and fit for use prior to resuming operations. 11. Notify the department and appropriate state and local authorities before resuming operations. 12. Submit an incident report to the department within 15 days.	Y	662.034(1)(d) Photo ☐

LARGE QUANTITY GENERATOR INSPECTION

Section 7: Personnel Training Requirements

A. Generator has a program of classroom instruction or on-the-job training for personnel in hazardous waste management (NR 665.0016(1)(a)). If there is no training program go to question 8.A.	Y	662.034(1)(d) Photo☐
B. Program is directed by a person trained in hazardous waste management procedures (NR 665.0016(1)(b)).	Y	662.034(1)(d) Photo☐
C. Program teaches facility personnel hazardous waste management procedures relevant to the positions in which they are employed (NR 665.0016(1)(b)).	Y	662.034(1)(d) Photo☐
D. Training program ensures personnel are able to respond effectively to emergencies by familiarizing them with the following applicable items (NR 665.0016(1)(c)): 1. Contingency plan implementation. 2. Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment. 3. Key parameters for automatic waste feed cut-off systems. 4. Communications and alarm systems. 5. Response to fires or explosions. 6. Response to groundwater contamination incidents. 7. Shutdown of operations.	Y	662.034(1)(d) Photo☐
E. New employees are trained within 6 months of their assignment (NR 665.0016(2)).	Y	662.034(1)(d) Photo☐
F. Employees work in supervised positions until they have completed the training (NR 665.0016(2)).	Y	662.034(1)(d) Photo☐
G. Personnel take part in an annual review of the training (NR 665.0016(3)).	Y	662.034(1)(d) Photo☐
H. Generator keeps ALL of the following training documents (NR 665.0016(4)): 1. Job title and the employee name for each position related to hazardous waste management. 2. Job description for each of the above job titles. 3. Description of the amount and type of introductory and continuing training that will be given to each employee. 4. Records that required training has been given to each employee.	Y	662.034(1)(d) Photo☐
I. Training records are maintained until closure for current personnel and at least 3 years from the date the employee last worked at the facility (NR 665.0016(5)).	Y	662.034(1)(d) Photo☐

Section 8: 90-Day Container Accumulation

A. Waste is accumulated in containers. If NO, go to Section 9.	Y	Photo☐
B. Accumulation start date is clearly marked and visible for inspection on each container.	Y	662.034(1)(b) Photo☐
C. All containers are clearly marked with the words "Hazardous Waste".	Y	662.034(1)(c) Photo☐

Section 8: 90-Day Container Accumulation

D. If container is leaking or in poor condition, the contents are transferred to another container in good condition (NR 665.0171).	Y	662.034(1)(a)1 Photo☐
E. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).	Y	662.034(1)(a)1 Photo☐
F. Containers are kept closed, except when it is necessary to add or remove waste (NR 665.0173(1)).	Y	662.034(1)(a)1 Photo☐
G. Containers are opened, handled or stored to prevent leaks or ruptures (NR 665.0173(2)).	Y	662.034(1)(a)1 Photo☐
H. Container storage areas are inspected weekly for leaks and deterioration (NR 665.0174).	Y	662.034(1)(a)1 Photo☐
I. Containers of ignitable or reactive waste are located at least 50 feet from the property line (NR 665.0176).	Y	662.034(1)(a)1 Photo☐
J. Containers of incompatible wastes are separated or protected from each other by a physical barrier (dike, berm, wall or other device) (NR 665.0177(3)).	NA	662.034(1)(a)1 Photo☐
K. Incompatible wastes are stored in separate containers unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(1)).	NA	662.034(1)(a)1 Photo☐
L. Containers that previously held waste are properly washed before adding incompatible waste, unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(2)).	NA	662.034(1)(a)1 Photo☐

Section 9: Subchapter BB Standards for Equipment Leaks

A. Generator operates any of the following equipment containing or contacting hazardous wastes with organic concentration >= 10% by weight. If NO, go to Section 10 (NR 662.034(1)(a), NR 665.1050(2). 1. Pumps in light liquid service. 2. Compressors. 3. Pressure relief devices in gas or vapor service. 4. Sampling connection systems. 5. Open-ended valves or lines. 6. Valves in gas or vapor service or in light liquid service. 7. Pumps or valves in heavy liquid service 8. Pressure relief devices in light liquid or heavy liquid service. 9. Flanges or other connectors.	N	Photo☐
B. Equipment listed in Question 9.A. is excluded from subch. BB requirements because it is in vacuum service and individually listed in the facility operating record by an identification number (NR 665.1050(4), NR 665.1064(7)(e)).		662.034(1)(a) Photo☐
C. Equipment listed in Question 9.A. is excluded from subch. BB requirements because it operates < 300 hours per calendar year and is identified, either by list or location (area or group), in the facility operating record. (NR 665.1050(5), NR 665.1064(7)(f)).		662.034(1)(a) Photo☐
D. If the facility determines compliance with subch. BB by documenting compliance with Clean Air Act requirements, the documentation is readily available as part of the operating record (NR 665.1064(13)).		662.034(1)(a) Photo☐

Section 9: Subchapter BB Standards for Equipment Leaks

E. ALL of the following information used to determine the applicability of exclusions in Questions 9.B. - 9.D. is maintained at the facility (NR 665.1064(11)): 1. Analysis determining the design capacity of the hazardous waste management unit. 2. Statement listing the hazardous waste influent to and effluent from each hazardous waste management unit subject to subch. BB and an analysis determining whether these hazardous wastes are heavy liquids. 3. Up-to-date analysis and the supporting information used to determine whether or not equipment is subject to subch. BB.		662.034(1)(a) Photo☐
F. When knowledge of the nature of the hazardous waste stream or the process by which it was produced is used to determine the applicability of the exclusions, supporting documentation such as the following are maintained at the facility (NR 665.1064(11)): 1. Information that the production process does not use organic compounds. 2. The process is identical to a process at another facility where the total organic content was measured at <10%. 3. The process has not changed to affect the total organic concentration of the waste.		662.034(1)(a) Photo☐
G. The facility keeps records of new determinations performed when there are any changes that could result in an increase in the total organic content of the waste in contact with equipment that is not subject to subch. BB requirements (NR 665.1064(11)).		662.034(1)(a) Photo☐
H. All equipment stated in Question 9.A. is excluded from additional subch. BB requirements. If NO, complete the subch. BB inspection form.		 Photo☐

Section 10: Subchapter CC Level 1 Container Standards

A. The facility manages hazardous waste in containers with EITHER of the following design capacities. If NO, go to Question 10.R. (NR 665.1087(2)(a), NR 662.034(1)(a)1). 1. Between 26 and 119 gallons. 2. Greater than 119 gallons and not in light material service.	N	 Photo☐
B. Containers are exempt from CC regulation because of ALL of the following (NR 662.034(1)(a)1, NR 665.1083(3)(a), NR 665.1084(1)(a)1, NR 665.1083(3)(a), NR 665.1084(1)(a)2., NR 665.1084(1)(b)): 1. The average VO concentration at the point of origination is <500 ppmw for all hazardous waste entering the container. 2. The initial determination of the average VO concentration for the waste stream was made before the material was placed in the container. 3. The initial determination is reviewed and updated at least once every 12 months. 4. A new waste determination is performed whenever changes to the source generating the waste stream likely causes the average VO concentration to increase to >= 500 ppmw. 5. The average VO concentration is determined by direct measurement or by knowledge. Note: See NR 665.1084(1)(c) for direct measurement procedures and NR 665.1084(1)(d) for using knowledge.		 Photo☐
C. For each waste determination, the date, time, and location of each waste sample collected are maintained in the facility records (NR 665.1090(6)(a)).		662.034(1)(a)1 Photo☐
D. Containers are excluded from subch. CC because they are used to store or treat hazardous waste from organic peroxide manufacturing processes (NR 662.034(1)(a)1, NR 665.1080(4)). Note: Certain records are to be maintained. Refer to 665.1090(9) for more information.		 Photo☐
E. Containers are excluded from subch. CC because they are used solely to store or treat EITHER of the following (NR 662.034(1)(a)1, NR 665.1080(2), NR 665.1090(10)): 1. On-site remediation wastes generated through NR 700 or RCRA corrective action activities. 2. Radioactive mixed wastes in accordance with NRC requirements		 Photo☐

Section 10: Subchapter CC Level 1 Container Standards

F. Containers are excluded from subch. CC because BOTH of the following are met (NR 665.1080(2), NR 665.1090.(10)): 1. They are equipped with air emission controls operated in accordance with the Clean Air Act requirements. 2. Facility records include certification of such by the owner or operator and the specific air program compliance requirements for the containers		Photo☐
G. All containers are excluded from subch. CC Level 1 standards. If YES, go to Question 10.R.		Photo☐
H. Any of the following controls are used on all Level 1 containers (NR 665.1087(3)(a)): 1. Container meets applicable US DOT packaging requirements. 2. A cover and closure devices form a continuous barrier over the container openings such that when they are secured, there are no visible holes, gaps or other open spaces into the container. 3. An organic-vapor suppressing barrier is placed on or over the hazardous waste in an open-top container so that the hazardous waste is not exposed to the atmosphere. Note: Level 1 standards do not apply to satellite accumulation or RCRA empty containers.		662.034(1)(a)1 Photo☐
I. If Level 1 containers do not meet applicable US DOT packaging requirements, they are equipped with covers and closure devices composed of suitable materials that minimize exposure of hazardous waste to the atmosphere and maintain integrity of the covers and closure devices (NR 665.1087(3)(b)).		662.034(1)(a)1 Photo☐
J. If a Level 1 container is filled to the final level in one continuous operation, the closure device is promptly secured in the closed position when the filling operation is concluded (NR 665.1087(3)(c)1.a).		662.034(1)(a)1 Photo☐
K. If a Level 1 container is batch filled, the closure device is promptly secured in a closed position when the container is filled to the intended final level OR the batch loading is completed and any of the following first occurs (NR 665.1087(3)(c)1.b): 1. No additional material will be added within 15 minutes. 2. The person performing the loading operation leaves the immediate vicinity of the container. 3. The process generating the waste shuts down.		662.034(1)(a)1 Photo☐
L. If a Level 1 container is opened to remove hazardous waste, the closure device is secured in the closed position upon completion of a batch removal AND when either of the following first occurs (NR 665.1087(3)(c)2b): 1. No additional materials will be removed within 15 minutes. 2. The person removing the waste leaves the immediate vicinity of the container.		662.034(1)(a)1 Photo☐
M. If access to the inside of a Level 1 container is needed to perform routine activities other than the transfer of hazardous waste (e.g., sampling), the closure device is secured in the closed position promptly after completing the activity (NR 665.1087(3)(c)3).		662.034(1)(a)1 Photo☐
N. If a Level 1 container is equipped with a pressure relief device that vents to the atmosphere, ALL of the following conditions are met (NR 665.1087(3)(c)4): 1. The device is designed to operate with no detectable organic emissions (< 500 ppmv) when in the closed position. 2. The device is closed when the internal pressure is within the specified operating range. 3. The device opens and vents to the atmosphere only for the purpose of maintaining internal pressure according to the design specifications.		662.034(1)(a)1 Photo☐
O. Safety valves are only opened to avoid an unsafe condition (NR 665.1087(3)(c)5).		662.034(1)(a)1 Photo☐
P. When a defect is detected, initial repair efforts are made within 24 hours of detection and completed within 5 calendar days (NR 665.1087(3)(d)3).		662.034(1)(a)1 Photo☐

LARGE QUANTITY GENERATOR INSPECTION

Section 10: Subchapter CC Level 1 Container Standards

Q. If repairs cannot be completed in 5 days of detecting the defect, the waste is removed from the container which is not used until it is repaired (NR 665.1087(3)(d)3).		662.034(1)(a)1 Photo☐

Section 11: Subchapter CC Level 2 Container Standards

A. The facility manages hazardous waste containers with a design capacity >119 gallons that are in light material service. If NO, go to Section 12.	N	 Photo☐
B. Any of the following controls are used on Level 2 containers: (NR 665.1087(4)(a)) 1. Container meets applicable US DOT packaging requirements. 2. Each potential leak interface where organic vapor leakage could occur on the container, cover and closure device has been checked to determine that no detectable organic emissions (< 500 ppmv) are occurring. 3. The facility has demonstrated within the last 12 months that the containers are vapor-tight using Method 27 in appendix A of 40 CFR part 60.		662.034(1)(a)2 Photo☐
C. If the potential leak interface on the containers were checked, BOTH of the following were met: (NR 665.1087(4)(a)) 1. Checks were made on the interface of the cover rim and the container wall; the periphery of any opening on the container or container cover and its associated closure device; and, the sealing seat interface on a spring-loaded, pressure-relief valve. 2. The test was performed when the container was filled with a material having a VO concentration representative of the hazardous waste expected to be stored in the container.		662.034(1)(a)2 Photo☐
D. The facility maintains a copy of the procedure used to determine that containers >119 gallons in size that do not meet DOT requirements are not managing hazardous waste in light material service. (NR 665.1087(3)(e))		662.034(1)(a)2 Photo☐
E. Level 2 controls are used when transferring waste in or out of the container that minimize exposure to the atmosphere (submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices. (NR 665.1087(4)(b))		662.034(1)(a)2 Photo☐
F. If the container is filled to the final level in one continuous operation, the closure devices are promptly secured in the closed position when the filling operation is concluded. (NR 665.1087(4)(c)1.a.)		662.034(1)(a)2 Photo☐
G. If the container is batch filled, the closure devices are promptly secured in a closed position upon filling the container to the intended final level, or when the batch loading is completed and ANY of the following first occurs: (NR 665.1087(4)(c)1.b.) 1. No additional material will be added within 15 minutes. 2. The person performing the loading operation leaves the immediate vicinity of the container. 3. The process generating the waste shuts down.		662.034(1)(a)2 Photo☐
H. If containers are opened to remove hazardous waste, closure devices are secured in the closed position upon completion of a batch removal and either of the following first occurs: (NR 665.1087(4)(c)2.b.) 1. No additional materials will be removed within 15 minutes. 2. The person removing the waste leaves the immediate vicinity of the container.		662.034(1)(a)2 Photo☐
I. If access to the inside of the container is needed to perform routine activities other than the transfer of hazardous waste (e.g., sampling), the closure device is secured in the closed position promptly after completing the activity. (NR 665.1087(4)(c)3.)		662.034(1)(a)2 Photo☐

LARGE QUANTITY GENERATOR INSPECTION

Section 11: Subchapter CC Level 2 Container Standards

J. If the container is equipped with a pressure relief device that vents to the atmosphere, the device meets ALL of the following conditions: (NR 665.1087(4)(c)4.) 1. Designed to operate with no detectable organic emissions when in the closed position. 2. Closed when the internal pressure is within the specified operating range. 3. Opens and vents to the atmosphere only for the purpose of maintaining internal pressure according to the design specifications.		662.034(1)(a)2 Photo ☐
K. Safety valves are only opened to avoid an unsafe condition. (NR 665.1087(4)(c)5.)		662.034(1)(a)2 Photo ☐
L. When a defect is detected, initial repair efforts are made within 24 hours of detection. (NR 665.1087(4)(d)3.)		662.034(1)(a)2 Photo ☐
M. Repairs are completed within 5 days, or the waste is removed from the container which is not used until the defect is repaired. (NR 665.1087(4)(d)3.)		662.034(1)(a)2 Photo ☐

Section 12: Subchapter CC Level 3 Container Standards

A. The facility manages hazardous waste in containers having a design capacity >26 gallons during a waste stabilization process when hazardous waste is exposed to the atmosphere. If NO, go to Section 13.	N	Photo ☐
B. The container is vented directly through a closed-vent system to a control device, or the container is vented inside an enclosure which is exhausted through a closed-vent system to a control device. (NR 665.1087(5)(a))		662.034(1)(a)2 Photo ☐
C. If the container is vented inside an enclosure, the enclosure is operated according to the criteria for permanent total enclosures found in Method 204 in appendix M of 40 CFR part 51. (NR 665.1087(5)(b)1.)		662.034(1)(a)2 Photo ☐
D. Records for the most recent set of calculations and measurements verifying the enclosure meets the criteria for a permanent total enclosure in Method 204 in appendix M of 40 CFR part 51 are maintained at the facility. (NR 665.1090(4)(a))		662.034(1)(a)2 Photo ☐
E. Level 3 controls are used when wastes are transferred in or out of the container that minimize exposure to the atmosphere (e.g., submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices. (NR 665.1087(5)(f))		662.034(1)(a)2 Photo ☐

Section 13: Satellite Accumulation

A. Waste is accumulated in satellite accumulation areas. If NO, go to Section 14.	Y	Photo ☐
B. Generator accumulates no more than 55 gallons of hazardous waste or 1 quart of acute hazardous waste in each satellite area.	Y	662.034(3)(a) Photo ☐
C. Satellite containers are under the control of the operator of the process generating the waste.	Y	662.034(3)(a) Photo ☐
D. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).	Y	662.034(3)(a)1 Photo ☐

LARGE QUANTITY GENERATOR INSPECTION

Section 13: Satellite Accumulation

E. If a container is leaking or in poor condition, the contents are transferred to another container in good condition (NR 665.0171).	Y	662.034(3)(a)1 Photo ☐
F. Containers are kept closed except when it is necessary to add or remove waste (NR 665.0173(1)).	N	662.034(3)(a)1 Photo ☐
G. Containers are marked "Hazardous Waste" or with other words that identify the contents.	N	662.034(3)(a)2 Photo ☐
H. Container holding the excess waste is marked with the date the excess amount begins accumulating.	N DS.	662.034(3)(b) Photo ☐
I. Generator complies with the 90 day accumulation requirements with respect to the excess amount within 3 days of it being generated.	Y	662.034(3)(b) Photo ☐

Section 14: Waste Minimization

A. Generator includes waste minimization information in the annual report.	Y	662.041(3)(e) Photo ☐
B. Generator has a program in place to reduce the volume or quantity and toxicity of waste to an economically practicable degree. Note: The inspector should look for evidence justifying the generator's waste minimization certification on the manifest. Also, EPA guidance recommends that the generator have a written waste minimization/pollution prevention plan.	Y	662.027(1) Photo ☐

Section 15: Used Oil

A. Used oil is managed on-site. If NO, go to Section 16	N	 Photo ☐
B. Used oil containing >= 1,000 ppm halogens is managed as listed hazardous waste or the rebuttable presumption requirements have been met.		679.10(2)(a)2 Photo ☐
C. Used oil containers and tanks are in good condition and not leaking.		679.22(2) Photo ☐
D. Used oil containers and tanks are marked "used oil".		679.22(3)(a) Photo ☐
E. Transporter has an EPA ID number, except when generator self-transports or has a tolling agreement.		679.24 Photo ☐
F. Used automotive oil filters and oil absorbent material are not land filled, except if less than 1 gallon absorbent results from a non-routine spill.		 Photo ☐

LARGE QUANTITY GENERATOR INSPECTION

Section 15: Used Oil

G. If used oil is burned in an on-site used oil-fired space heater, all of the following are met: 1. Only used oil from the generator or household do-it-yourselfers is burned. 2. The heater is designed with a maximum capacity of 0.5 million BTU per hour or less. 3. The combustion gases are vented to the ambient air.		679.23 Photo ☐
H. If used oil is accepted from others or sent off-site to be burned in a space heater, the used oil meets fuel specifications and the marketer requirements in NR 679 subch. H are met.		679.11 Photo ☐

Section 16: F006 Wastewater Treatment Sludge

A. Generator accumulates F006 sludge for more than 90 days. If NO, go to Section 17.	N	 Photo ☐
B. The F006 waste is accumulated for no more than 180 days, unless the waste is shipped 200 miles or more.		662.034(7) Photo ☐
C. Pollution prevention practices are in place to reduce the amount of contaminants entering the F006 waste.		662.034(7)(a) Photo ☐
D. The F006 waste is legitimately recycled through metals recovery.		662.034(7)(b) Photo ☐
E. No more than 20,000 kg (44,100 lbs) of F006 waste is accumulated on-site.		662.034(7)(c) Photo ☐
F. Accumulation containers meet subch. I, AA, BB and CC standards in ch. NR 665.		662.034(7)(d)1.a Photo ☐
G. The accumulation start date is clearly marked and visible for inspection on each container.		662.034(7)(d)3 Photo ☐
H. Accumulation tanks meet subch. J, AA, BB and CC standards in ch. NR 665, except for NR 665.0197(3) and NR 665.0200.		662.034(7)(d)1.b Photo ☐
I. Each container and tank of F006 waste is clearly marked with the words "Hazardous Waste".		662.034(7)(d)4 Photo ☐
J. A containment building used for accumulation meets subch. DD standards in ch. NR 665; a P.E. certification stating compliance with the design standards is in the operating record AND written procedures and documentation for emptying the unit within 180 days are on file.		662.034(7)(d)1.c Photo ☐
K. The accumulation of F006 waste is included in the preparedness and prevention procedures, contingency plan and personnel training program.		662.034(7)(d)5 Photo ☐
L. If waste is accumulated for up to 270 days, the generator must ship the waste over 200 miles for metals recovery.		662.034(8) Photo ☐

Section 17: Generator Status Evaluation

A. Waste is accumulated for less than 90 days, except as allowed in Sections 13 and 16.	Y	662.034(1) Photo☐
B. More than 2,205 lbs. of non-acute hazardous waste; 2.2 lbs. of acute hazardous waste; or, 220 lbs. of residue from cleanup of an acute hazardous waste spill is generated in any month (NR 662.190(1), NR 662.220(4)).	Y	 Photo☐
C. Describe other activities that the generator conducts at the facility (accumulation in tanks, recycling, 10-day transfer, transporter, used oil, treatment, storage, disposal, universal waste, etc.).		 Photo☐
D. If waste was previously accumulated in a tank system, the generator performed EITHER of the following (NR 665.0197(1), NR 665.0197(2)): 1. Closure by removing or decontaminating waste residues, contaminated containment system components, soils, structures and equipment. 2. Initiated long-term care if all contaminated soils cannot be practicably removed or decontaminated.	NA	662.034(1)(a)2 Photo☐

UNIVERSAL WASTE HANDLER INSPECTION REPORT - LARGE QUANITY HANDLER

Revision: 10/10/2011
WASTE & MATERIALS MANAGEMENT PROGRAM

This Inspection Form, used for the inspection of facilities that generate or handle 5000 kg or more of universal waste (hazardous waste batteries, pesticide, lamps, antifreeze, and some mercury containing devices), evaluates facility compliance with Wisconsin's Hazardous Waste Management Rules (chapters NR 660-679, Wis. Admin. Code). The Universal waste regulations streamline the requirements for hazardous waste batteries, pesticide, lamps, antifreeze, and some mercury containing devices. Persons treating, disposing, recycling, or otherwise processing universal wastes are subject to applicable hazardous waste regulations.

Section 1: Prohibitions

A. Universal waste is not disposed on-site.	Y	673.31(1) Photo ☐
B. Universal waste is not diluted or treated on-site. Note: Dilution or treatment does not include: sorting, mixing, discharging, regenerating, or disassembling batteries; removing batteries from consumer products or removing electrolytes; removing thermostat ampules; or, responding to a release of universal waste.	Y	673.31(2) Photo ☐

Section 2: General Standards

A. Universal waste batteries and thermostats that are broken or show evidence of leakage or spillage are placed in closed, structurally sound containers that are compatible with the waste and not leaking.	Y	673.33 Photo ☐
B. Universal waste ~~pesticides~~ and lamps are placed in closed, structurally sound containers that are compatible with the waste and not leaking.	Y	673.33 Photo ☐
C. Sorting, mixing or handling of batteries is only conducted if the battery casing is not breached and remains intact.	Y	673.33(1)(b) Photo ☐
D. Wastes generated by handling or cleaning up spills of universal wastes are managed according to hazardous waste or solid waste rules.	Y	673.33 Photo ☐
E. If mercury containing ampules are removed from thermostats, the handler meets ALL of the following: 1. Ampules are removed In a manner that prevents breakage. 2. Removal is conducted over a containment device. 3. Spills or leaks are cleaned up immediately. 4. Removal is performed in a well ventilated, monitored environment.	Y	673.33(3)(b) Photo ☐
F. Pesticides are placed in a tank that meets NR 665 subch. J requirements, except closure and post closure requirements in NR 665.0197(3) and waste analysis requirements in NR 665.0200.	NA	673.33(2) Photo ☐
G. Pesticides are placed in a transport vehicle or vessel that is closed, structurally sound, not leaking and compatible with the waste.	NA	673.33(2) Photo ☐
H. All universal wastes are labeled or marked "Waste" or "Used" followed by the specific type of universal waste handled or "Universal Waste".		673.34 Photo ☐
I. Containers, tanks, or transport vehicles of recalled pesticides are additionally marked with the label that was on or accompanied the product when it was sold or distributed.	NA	673.34 Photo ☐
J. Length of accumulation time is demonstrated by ANY of the following: (1) Mark or label each container with the earliest date the waste is generated or received. (2) Mark or label the individual item of waste with the date it was generated or received. (3) Maintain an inventory system identifying the date the waste was generated or received. 4. Place the universal waste in a specific accumulation area identified with the earliest date the waste was generated or received. 5. Use some other method that clearly demonstrates the length of accumulation time.	Y	673.35(3) Photo ☐
K. Universal waste is accumulated for less than one year from the date generated or received from another handler.	Y	673.35(1) Photo ☐

UNIVERSAL WASTE HANDLER INSPECTION REPORT - LARGE QUANITY HANDLER

Section 2: General Standards

L. If universal waste is accumulated beyond one year, the handler can prove that accumulation was necessary to facilitate proper recovery, treatment or disposal.	NA	673.35(2) Photo ☐
M. Employees are trained on the proper handling and emergency procedures appropriate to the types of waste handled at the facility.	Y	673.36 Photo ☐
N. Handler complies with ALL of the following when a release occurs: 1. Immediately contains the release. 2. Determines if the spill residue is hazardous waste. 3. If hazardous waste, disposes of it as such.	Y	673.37 Photo ☐
O. EPA ID# was obtained before meeting or exceeding 5,000 kg (11,025 lb).	Y	673.32(1) Photo ☐

Section 3: Off-site Shipments

A. Handler sends the waste to a destination facility, foreign destination or another handler.	Y	673.38(1) Photo ☐
B. Handler that self-transports complies with ALL of the following: 1. Applicable US DOT regulations in 49 CFR parts 171 to 180 when transporting universal waste that meets the definition of hazardous materials. 2. Immediately contain release and make waste determination on spill residue. 3. If shipped to a foreign destination other than an OECD country, use an EPA acknowledgement of consent.	Y	673.38(2) Photo ☐
C. For hazardous materials, the handler packages, labels, marks, placards and prepares the proper shipping papers in accordance with DOT requirements in 49 CFR parts 172 to 180.	Y	673.38(3) Photo ☐
D. If shipping to another universal waste handler, the handler has agreed to receive the shipment.	Y	673.38(4) Photo ☐
E. If a shipment was rejected, EITHER of the following occurred: 1. The waste was sent back to the originating handler. 2. The originating handler agreed on a destination facility to which to ship the waste.	NI	673.38 Photo ☐
F. The handler immediately notifies the Department if they receive a shipment containing hazardous waste.	Y	673.38(7) Photo ☐
G. Nonhazardous, nonuniversal waste in a universal waste shipment is managed in compliance with the solid waste requirements.	Y	673.38(8) Photo ☐

Section 4: Record Keeping

A. Records for each shipment of universal waste received at the facility contains ALL of the following information: 1. The name and address of the originating handler or foreign shipper. 2. The quantity of each type of universal waste received. 3. The date the shipment was received.	Y	673.39(1) Photo ☐

Section 4: Record Keeping

B. Records for each shipment of universal waste sent off-site contains the following information 1. The name and address of the facility to which the waste was sent. 2. The quantity of each type of universal waste sent. 3. The date the shipment of universal waste left the facility.	Y	673.39(2) Photo ☐
C. Records are retained for at least 3 years from the date the shipment was received or from the date the shipment left the facility.	Y	673.39(3) Photo ☐

TRANSPORTATION & TRANSFER FACILITY INSPECTION

Revision: 09/28/2011
WASTE & MATERIALS MANAGEMENT PROGRAM

This Inspection Form, used for the inspection of hazardous waste transfer facilities and hazardous waste transporters, evaluates facility compliance with Wisconsin's Hazardous Waste Management Rules (chapters NR 660 - 679, Wis. Adm. Code).

Section 1: Notification and Licensing

A. The transporter has submitted a notification form and obtained an EPA ID#. Note: A subsequent notification should be submitted when there is an ownership or name change.	Y	663.11(1) Photo ☐
B. A transportation license has been issued to each location where transport vehicles are based.	NI	663.13(1)(b) Photo ☐
C. If ownership changed, the new owner has re-applied for a transportation license by submitting a license application form.	NI	663.13(1)(h) Photo ☐

Section 2: Manifest Requirements

A. The transporter ensures that the manifest accompanying the hazardous waste shipment is signed and dated by the generator.	Y	663.20(1)(a) Photo ☐
B. The transporter leaves a signed and dated copy of the manifest with the generator.	Y	663.20(2) Photo ☐
C. The transporter retains one copy of the manifest signed and dated by the TSDF or next transporter for a period of 3 years from the date the hazardous waste was accepted by the initial transporter.	Y	663.20(4) Photo ☐
D. The transporter delivers the entire quantity of hazardous waste from a generator or transporter to the following: 1. The designated facility listed on the manifest. 2. An alternate facility if an emergency prevents delivery to the designated facility. 3. The next designated transporter. 4. A facility outside of the U.S. as designated by the generator.	Y	663.21(1) Photo ☐
E. If the waste cannot be delivered to the designated or alternate facility because of an emergency situation, the transporter contacts the generator for further directions and revises the manifest according to the generator's instructions.	NI	663.21(2)(a) Photo ☐
F. If the transporter transports SQG waste pursuant to a reclamation agreement, ALL of the following requirements are met: 1. The name, address and EPA ID# of the generator; the quantity of waste accepted; DOT shipping information; and, the date the waste is accepted are recorded on the log or shipping paper for each shipment. 2. The transporter carries the log or shipping paper during transport of the waste to the reclamation facility. 3. The transporter retains the shipping records for a period of at least 3 years after termination or expiration of the agreement.	NA	663.20(8) Photo ☐

Section 3: Rejected Waste

A. The transporter has transported partial or full load rejections. If NO, go to Section 4.	N	 Photo ☐

Section 3: Rejected Waste

B. For a partial load rejection or regulated container residue that occurs while the transporter is at the designated facility, the transporter obtains BOTH of the following: 1. A copy of the original manifest that includes the date and signature from the designated facility; the manifest tracking number of the new manifest accompanying the shipment; and, a description of the partial rejection or container residue in the discrepancy block. 2. A new manifest to accompany the shipment to an alternate facility or the generator.		663.21(2)(b)1 Photo ☐
C. If a full load rejection is taken back to the generator, the transporter obtains a copy of the original manifest or a new manifest.		663.21(2)(b)2 Photo ☐
D. If the original manifest is used for a full load rejection, the original manifest includes ALL of the following: 1. The rejecting facility's signature and date of rejection. 2. A description of the rejection in the discrepancy block of the manifest. 3. The name, address, phone number, and ID# for the alternate facility or generator to whom the shipment will be delivered.		663.21(2)(b)2 Photo ☐
E. The transporter retains a copy of the manifest documenting the rejected shipment for 3 years from the date the hazardous waste was accepted by the initial transporter.		663.22(1) Photo ☐

Section 4: Transfer Facilities

A. The transporter operates a transfer facility. If NO, go to Section 5.	Y	 Photo ☐
B. All containers are stored for 10 days or less.	Y	663.12 Photo ☐
C. Hazardous waste containers comply with the DOT packaging requirements stated in 49 CFR.	Y	663.12 Photo ☐
D. If hazardous waste with different DOT shipping descriptions are mixed and placed into a single container, the transporter complies with applicable generator requirements stated in ch. NR 662. Note: The applicable generator requirements consist of the manifesting requirements in subch. B of NR 662.	NA	663.10(b) Photo ☐

Section 5: Hazardous Waste Discharge During Transportation

A. A hazardous waste discharge has occurred during transportation. If NO, go to Section 6.	N	 Photo ☐
B. The transporter took appropriate immediate action as required by ch. NR 708 (notify local authorities, dike the discharge area, etc.).		663.30(1) Photo ☐

TRANSPORTATION & TRANSFER FACILITY INSPECTION

Section 5: Hazardous Waste Discharge During Transportation

C. The transporter complied with ALL of the following: 1. Notify the national response center at 800-424-8802. 2. Submit a written report to the DOT Office of Hazardous Materials Regulations in Washington, D.C. 3. Notify the Wisconsin Division of Emergency Management at 800-943-0003. 4. Comply with the spills notification and response requirements of s. 292.11, Stats, and ch. NR 706.		663.30(3) Photo☐
D. If a discharge occurred during water transport, the transporter notified the National Response Center.		663.30(4) Photo☐
E. The transporter cleaned up the hazardous waste discharge or took other required actions so that the discharge no longer presents a hazard to human health or the environment.		663.31 Photo☐

Section 6: Exporting Waste

A. The transporter transports waste out of the U.S. If NO, go to Section 7.	N	 Photo☐
B. The transporter complies with ALL of the following requirements: 1. Signs and dates the manifest in the international shipments block of the manifest to indicate the date the shipment left the U.S. 2. Retains a manifest copy for 3 years from the date the hazardous waste was accepted by the initial transporter. 3. Returns a signed manifest copy to the generator. 4. Gives one manifest copy to the U.S. customs official at the point of departure from the U.S.		663.20(7) Photo☐
C. The transporter ensures a copy of the EPA acknowledgement of consent accompanies the exported shipment.		663.20(3) Photo☐
D. If the transporter transports waste into Wisconsin from another country, the transporter complies with the ch. NR 662 generator standards. Note: Complete the generator inspection form.		663.10(3)(a) Photo☐

Section 7: Bulk Transport by Water or Rail

A. The transporter conducts bulk transport by water or rail. If NO, go to Section 8.	N	 Photo☐

TRANSPORTATION & TRANSFER FACILITY INSPECTION

Section 7: Bulk Transport by Water or Rail

B. If bulk shipments are transported by water to the designated facility, ALL of the following are met: 1. A shipping paper containing all of the manifest information, excluding the EPA ID #'s, generator certification and signatures, accompanies the hazardous waste. 2. If the waste is exported, an EPA acknowledgement of consent accompanies the hazardous waste. 3. The delivering transporter obtains the date of delivery and signature of the designated facility on the manifest or shipping paper. 4. The person delivering the hazardous waste to the initial water transporter obtains the date of delivery and signature of the water transporter on the manifest and forwards it to the destination facility. 5. The water transporter retains a copy of the shipping paper or manifest for 3 years from the date the waste was received by the initial transporter.		663.20(5) Photo ☐
C. If shipments are transported by rail, the initial rail transporter does ALL of the following when accepting hazardous waste from a non-rail transporter: 1. Sign and date the manifest. 2. Return a signed copy of the manifest to the non-rail transporter. 3. Forward at least 3 copies of the manifest to the next non-rail transporter; the designated facility if the shipment is delivered by rail; or, the last rail transporter handling the waste in the U.S. 4. A copy of the manifest and rail shipping paper is retained for 3 years from the date the waste is accepted by the initial transporter.		663.20(6)(a) Photo ☐
D. The rail transporter ensures a shipping paper containing all of the manifest information, excluding the EPA ID #'s, generator certification and signatures, accompanies the hazardous waste.		663.20(6)(b) Photo ☐
E. If the waste is exported by rail, an EPA acknowledgement of consent accompanies the hazardous waste.		663.20(6)(b) Photo ☐
F. The final rail transporter delivering hazardous waste to the designated facility complies with BOTH of the following: 1. The date of delivery and signature of the designated facility are obtained on the manifest or the shipping paper, if the manifest has not yet been received by the facility. 2. A copy of the signed manifest or signed shipping paper is retained for 3 years from the date the waste was accepted by the initial transporter.		663.20(6)(c) Photo ☐
G. The rail transporter complies with BOTH of the following when delivering hazardous waste to a non-rail transporter: 1. Obtains the date of delivery and signature of the non-rail transporter on the manifest. 2. A copy of the signed manifest or signed shipping paper is retained for 3 years from the date the waste was accepted by the initial transporter.		663.20(6)(d) Photo ☐
H. The non-rail transporter does BOTH of the following when accepting hazardous waste from a rail transporter: 1. Sign and date the manifest. 2. Provide a copy of the manifest to the rail transporter.		663.20(6)(e) Photo ☐

Section 8: Status Evaluation

A. Describe other activities conducted by the transporter and complete appropriate inspection reports.		 Photo ☐

- Universal Waste Handler
- Medical Waste
- Electronic Waste